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August 29, 2019

Natalie K. Creed, Hazardous Waste Bureau Chief
Waste Management & Remediation Program Office
Division of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255

RE: US Ecology Idaho, Inc. (USEI) – IDD073114654
Permit Conditions I.E.5 and I.E.6: Clean Copies of Revised Relevant Portions of USEI's Part B RCRA Permit and Updated Attachment 26

Dear Ms. Creed:

In accordance with the USEI RCRA Part B Permit (Permit Conditions I.E.5 and I.E.6), this letter is submitted to provide clean copies of the relevant portions, including an updated Attachment 26, of USEI's RCRA Part B Permit, following the approval of USEI's May 31, 2019 Class 2 Permit Modification.

Attachment 26 is the permit modification tracking log. This log will be updated and submitted with each modification that is approved. Clean copies of relevant documents, including Attachment 26, have been included as an attachment to this letter.

If there are any additional questions or comments concerning this submittal please do not hesitate to call me or Rebecca Hogaboam at (208) 834-2275.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Regards,

Jason Evens
General Manager

Attachments

cc: Barbara McCullough-USEPA Region X (Electronic Copy)
Garrett Bright – IDEQ (Electronic Copy)

Permit Modules

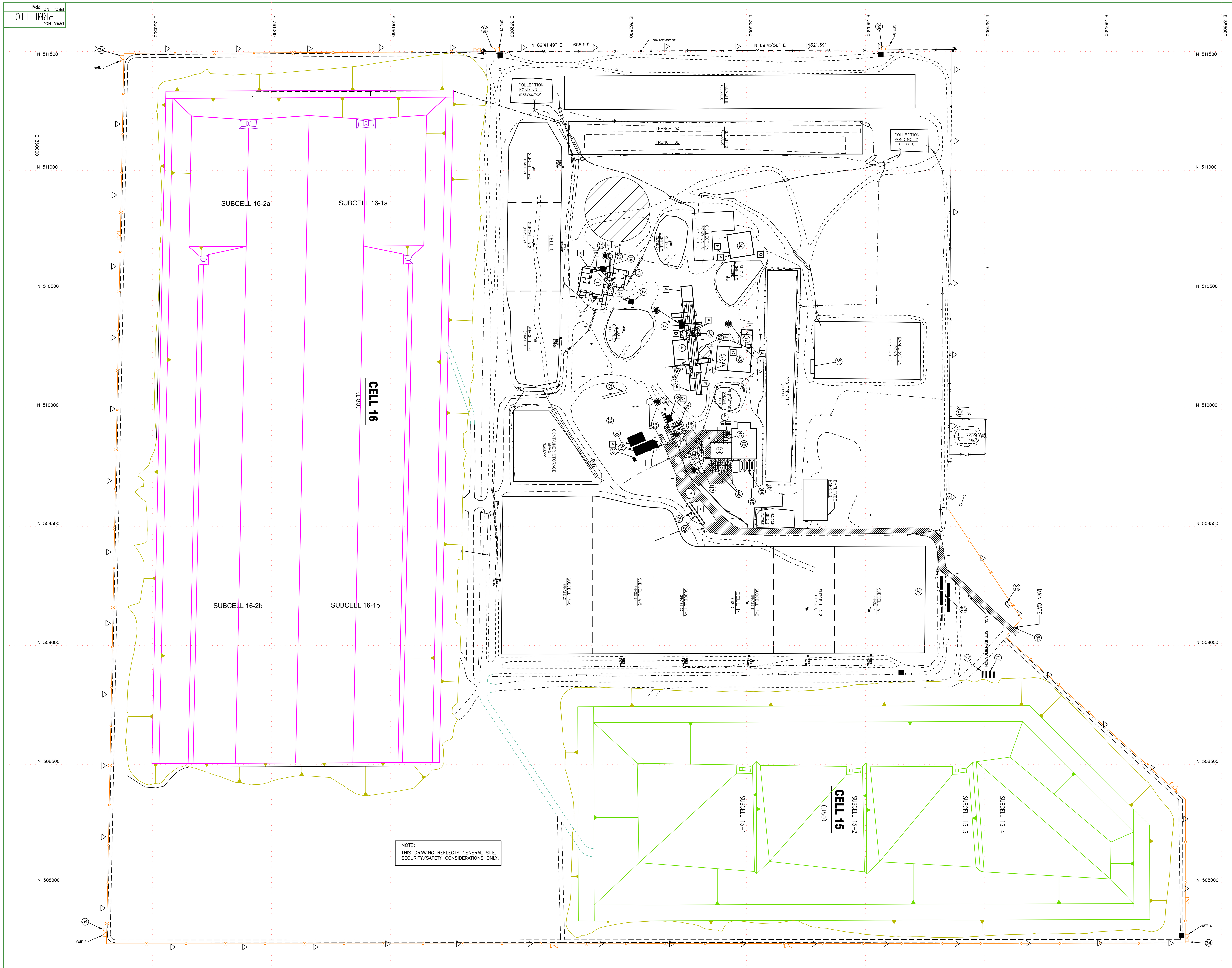
LIST OF ATTACHMENTS

The following documents are excerpts from the Permittee's RCRA Permit Application dated May 1, 2014 or revised documents dated August 28, 2015, with the sections and pages specified. The Permit Application and applicable attachments from the previous RCRA Permit are part of the official Administrative Record for the facility. The documents listed below are hereby incorporated, in their entirety, by reference into this Permit. The Department has modified specific language in the attachments, as deemed necessary. These modifications are described in the permit conditions (Modules I through XIII) and, thereby, supersede the language of the original attachment. All references in these attachments to the Agency or to designated representatives of the Agency shall also refer to the Department or to designated representatives of the Department. All references in any of the attachments of this Permit to "Envirosafe Services of Idaho Inc. (ESII)" are superseded by reference to "U.S. Ecology Idaho (USEI)." These incorporated attachments are enforceable conditions of this Permit, as modified by the specific permit conditions.

Attachment 1	Facility Legal Description and Map of Facility Location, consisting of: Section B, Pages 1 through 7, Table B-1, Figure B-1, Location of USEI Site B Facility, of Permit Application as last revised August 28. 2015, Appendix B.1, Corporate Warranty Deed of Correction, Pages B.1-1 through B.1-7, of Permit Application, dated May 1, 2014, Drawing PRMI-T03, Typical Facility Site Plan, Rev. B, and Drawing PRMI-T01, General Facility Topographic Plan Sheet 1, Revision B, of Permit Application, as last revised April 25, 2017.
Attachment 2	Waste Analysis Plan, consisting of: Section C, Pages 1 through 60, including Figures C-1 through C-11, of Permit Application, as last revised August 28, 2015, Appendix C.1, and Appendix C.2, of Permit Application, dated May 1, 2014.
Attachment 3	Security Procedures, consisting of: Subsections F.0 and. F.1, Pages 1 through 3, of Permit Application, dated May 1, 2014, and Drawing PRMI-T10, Revision C of Permit Application, as last revised May 31, 2019.
Attachment 4	Inspection Plan, consisting of: Subsections F.2 and F.3, Pages 1 through 12, including Table F-1 and Figures F-1 through F-24, of Permit Application, as last revised May 31, 2019.
Attachment 5	Training Plan, consisting of: Section H, Pages 1 through 10, including Tables H-1 through H-4 of Permit Application, as last revised August 28, 2015.
Attachment 6	Hazards Prevention Plan, consisting of: Subsections F.4 and F.5, Pages 1 through 9, of Permit Application, as last revised May 31, 2019.

Attachment 7	Contingency Plan, consisting of: Section G, Pages 1 through 25, including Tables G-1 through G-8 and Figures G-1 through G-7, of Permit Application, as last revised May 31, 2019.
Attachment 8	Response Action Plan, consisting of: Section M, Pages 1 through 26 including Tables M-1 through M-9, as last revised November 18, 2017.
Attachment 9	Closure and Post-Closure Plans, consisting of: Section I, Pages 1 through 48, including Tables I-1 through I-8 and Figures I-3 through I-6, as last revised July 02, 2019; and Drawing PRMI-T13, Facility Typical Topographic Plan Final at Closure, Revision F, of Permit Application, as last revised August 28, 2015.
Attachment 9a	Final Cover Design for Cells 14 and 15, consisting of: Appendix I.15, of Permit Application dated May 1, 2014, including: Appendix A – Drawings Appendix B – CQA Plan Appendix C -- Specifications Appendix D -- Calculations
Attachment 9b	Final Cover Design for Cell 16, consisting of: Appendix I.16, of Permit Application dated May 1, 2014, including: Appendix A – Drawings Appendix B – CQA Plan Appendix C – Calculations
Attachment 10	Surface Water Management Plan, consisting of: Section N, Pages 1 through 15, including Tables N-1 through N-8, as last revised November 28, 2017. Drawing PRMI-D01 Surface Drainage Plan – Existing Conditions, Revised July 22, 2016, Drawing PRMI-D02 Surface Drainage Plan – Interim Conditions, Revised July 22, 2016, and Drawing PRMI-D03 Surface Drainage Plan – Final at Closure, last revised May 13, 2016.
Attachment 11	Ground Water Monitoring Plan, consisting of: Section E, Pages 1 through 95, including Tables E-1 through E-24, Figures E-3 through E-36, Plate E-10 of Permit Application, as last revised April 02, 2018, Appendix E.6, 2010 Re-evaluation of Rising Ground Water, and Appendix E.14, Alternative Concentration Limit Demonstration Report, of Permit Application, dated May 1, 2014.
Attachment 12	RCRA Part A Permit Application, consisting of: Section A, Pages 1 through 5, Figures A-1 through A-4, of Permit Application, as last revised November 18, 2017, Appendix A-1, RCRA Part A Permit Application, as last revised September 27, 2017 and Appendix A-2, Part A Continuation Form, of Permit Application, of the Permit Application as last revised May 1, 2014.

Attachment 3



LEGEND

- 5/8" IRON PIN W/ ALUMINUM CAP
- POWER POLE
- PAVED ROAD
- UNIMPROVED ROAD
- FENCE LINE
- PROPERTY BOUNDARY
- RCRA UNIT BOUNDARY
- CULVERT
- DRAINAGE
- CARRIER PIPE
- LEACHATE PIPE W/SLEEVE
- POND WATER TRANSFER PIPE
- (34) FACILITY KEY NUMBER
- POSTED SIGN – "DANGER – UNAUTHORIZED PERSONNEL – KEEP OUT"
- METAL BOX CONTAINING COMBINATION TO GATE
- WARNING SIGN "DANGER – HARD HAT AREA"
- WARNING SIGN "NO SMOKING, MATCHES OR OPEN LIGHTS"

FACILITY KEY

1	CONTAINER STORAGE PAD 4	31	WEATHER STATION
2	COMPRESSOR/MCC BUILDING	32	"UNASSIGNED"
3	STABILIZATION FACILITY OFFICE/FINGERPRINT LAB	33	"UNASSIGNED"
4	STABILIZATION FACILITY	34	EVACUATION GATES
5	PCB PROCESSING BUILDING–OUT OF SERVICE	35	RCRA STORAGE TANKS–4 UNITS
6	VEHICLE WASH FACILITY	36	CONTAINER STORAGE PAD 5
7	"UNASSIGNED"	37	PAD 6–RCRA STORAGE BUILDING APRON
8	"UNASSIGNED"	38	"UNASSIGNED"
9	"UNASSIGNED"	39	STABILIZATION BUILDING–OUT OF SERVICE
10	MAINTENANCE SHOP	40	BAG HOUSE–OUT OF SERVICE
11	"UNASSIGNED"	41	HEPA FILTER HOUSE AND FAN–OUT OF SERVICE
12	"UNASSIGNED"	42	YARD TRUCK SCALE
13	"UNASSIGNED"	43	CONTAINER STORAGE PAD 7
14	PAD 4 OFFICE	44	CONTAINMENT BUILDING TRUCK UNLOADING APRONS 1,2 AND 3–OUT OF SERVICE
15	FUEL STORAGE TANKS/FUELING STATION	45	CONTAINMENT BUILDING TRUCK UNLOADING RAMP–OUT OF SERVICE
16	CONTAINMENT BUILDING	46	STABILIZATION BUILDING TRUCK UNLOADING–OUT OF SERVICE APRONS 1 AND 2
17	PUMP HOUSE/WATER STORAGE TANKS	47	PROCESS PLANT PAD
18	COMPRESSED GAS STORAGE AREA	48	LEACHATE TREATMENT SYSTEM
19	"UNASSIGNED"	49	STABILIZATION FACILITY ADDITIVE SILOS
20	"UNASSIGNED"	50	STABILIZATION BUILDING ADDITIVE SILOS–OUT OF SERVICE
21	"UNASSIGNED"	51	EVAPORATION POND LOADING/UNLOADING AREA
22	RECORDS STORAGE BUILDING	52	OFFICE TRAILER SANITARY TANK
23	REAGENT STORAGE	53	LAB WASTE HOLDING TANK
24	SCALE HOUSE	54	"UNASSIGNED"
25	SECURITY BUILDING	55	ET CAP TEST PAD
26	PROPANE TANK	56	TEMPORARY ADMINISTRATION TRAILERS
27	SAMPLING PLATFORM	57	SAFETY SEA CONTAINER
28	STAGING AREA		
29	TRUCK SCALE		
30	"UNASSIGNED"		

SAFETY EQUIPMENT KEY

A	20/30 LB FIRE EXTINGUISHER	F	EYE WASH STATION
B	125 LB EXTINGUISHER	G	EMERGENCY ABSORBANT LOCATION
		H	SIREN/ STROBE LIGHT – OUT OF SERVICE
E	15 GAL EYE WASH	I	SIREN ONLY
		J	INDOOR EVACUATION LIGHTS – OUT OF SERVICE

REV.	BY / DATE	CHK'D / DATE	DESCRIPTION	PROJ ENGR / DATE	SUPV ENGR / DATE
C	KRH 5/31/19		TEMP OFFICES AND SEA CONTAINERS		
B	KRH 8/3/16		CELL 16 MODIFICATIONS		
A	NB 7/18/16		PART B PERMIT RENEWAL APPLICATION		

US ecology

SITE B
GRAND VIEW, IDAHO
US EPA ID NO. IDD 073 114 654

TITLE: FACILITY COMMUNICATION AND EMERGENCY RESPONSE EQUIPMENT PLAN

DRAWN BY: MK DATE 2/05/98	SCALE:	FILE CODE / DWG. NO. PRMI–T10	REV. NO. B
CHECKED DATE	ENGINEER DATE		
PROJ. MGR. DATE	APPROVED DATE	PROJ. NO. PRMI	

Attachment 4

Attachment 4
Inspection Plan
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Figure F-21 RCRA Storage Pad 7 Inspection Form (Daily)

Figure F-23 Landfill Area Post-Closure Inspection Form Cell 16 (Monthly)

Figure F-24 Leachate Treatment & Piping System (Daily)

F.2 Inspection Schedule

This Section outlines the schedule for inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards in accordance with IDAPA 58.01.05.012 and 58.01.05.008 (40 CFR §§270.14.(b)(5), and 264.15, and 264.33). The Section also addresses specific inspection areas in detail and contains examples of the inspection forms used at the facility. Table F-1 outlines inspection frequencies for each area of the facility.

F.2.a General Inspection Requirements

The following paragraphs identify facility equipment and operating areas, identify potential problems, and outline measures to prevent the occurrence of these problems. A copy of the completed inspection forms and the inspection schedule are kept at the facility. Completed inspection summaries are maintained for a period of at least three (3) years from the date of inspection.

As necessary, the format of the inspection forms may be modified from time to time to address ongoing inspection assignments. The intent of these changes would be to modify the organization of inspection forms as determined by implementation of inspection procedures. Changes to the inspection format would not require a formal permit modification since the content of the inspection forms/procedures would not be altered. Specifically, USEI can make changes to an inspection form if the revised form is “superior or equivalent” and the appropriate justification is placed in the operating record. The format of tables, forms, and the orientation of figures are not subject to the requirements of this Permit, and may be revised at USEI’s discretion. Any formatting change to inspection forms will be submitted to the DEQ for their records. Changes to the content of the inspection forms may require a formal Class 1, 2 or 3 Modification depending on the type of changes proposed.

F.2.a.(1) Types of Problems

Regular inspections are conducted to identify equipment malfunctions, structural deterioration, operator errors, uncontrolled run-off, leachate generation, or other discharges that could cause or lead to the release of hazardous waste constituents or that may threaten human health or the environment. The purpose of these inspections is to detect potential problems and to correct them before they result in a release of hazardous waste constituents and/or cause harm to human health or the environment.

Table F-1 presents the schedule of routine inspections for the various components/units critical to the proper operation of the facility. These inspections are considered important because of their role in preventing, detecting, or responding to environmental or human health hazards. Specific inspection items and potential problems associated with each inspection area are referenced in the following paragraphs as well as on each individual inspection form.

F.2.a.(2) Frequency of Inspections

The facility’s inspection schedule was developed based on applicable regulatory requirements, estimated rate of potential equipment deterioration, and the probability of an environmental or human health incident if any equipment deterioration, malfunction, or operator error were to go undetected between inspections. Table F-1 identifies the inspection frequency for each of the various facility components/units. The frequency of the scheduled inspections is based on a probability of an occurrence of an incident or malfunction and is designed to minimize the need to implement the facility’s Contingency Plan.

All facility units in which waste is actively being handled will be under surveillance for spills, malfunctions, and operator error during active operations. The activities discussed in the following paragraphs are more formal, documented procedures to support and verify these operational inspections.

In all active waste handling areas, a daily inspection is performed when the area is in use (i.e.; each operating day). Other areas are subject to weekly or monthly inspections.

For specified areas, identified in Table F-1, inspections are also performed after storm events of 0.50 inches of precipitation in 24 hours.
In accordance with IDAPA 58.01.05.008 (40 CFR §264.15), any deterioration or malfunction of equipment or structures that may cause or lead to the release of hazardous waste constituents or threaten the environment or human health will be corrected utilizing interim corrective measures, if necessary and final corrective measures. Where a hazard is imminent or has already occurred, action is taken expeditiously. Response actions for contingency procedures are provided in detail in the Contingency Plan.

F.2.b Unit-Specific Inspection Requirements

F.2.b.(1) Container Management Unit Inspection

Figures F-1, F-5, F-6, F-7, F-19, F-20, and F-21 are the inspection forms for the Container Management Units (CMUs), including:

- Container Storage Area 1 (CSA #1)
- Container Storage Pad 4 (CSP #4)
- Container Storage Pad 5 (CSP #5)
- RCRA(Pad 7)/PCB Storage Building
- Stabilization Facility
- Truck Unloading Aprons #'s 1 and 2 (Containment Building - Stabilization portion)
- Truck Unloading Apron #3 (Containment Building)

Containers may also be managed within the Containment Building as described in paragraph F.2.b(9).

Inspections of these units are conducted at the frequencies shown in Table F-1.

The CMUs are inspected for the presence of spilled material, leaking containers, and for deterioration of either the containers or the containment. If any of these conditions exist, corrective activities are instituted to clean up and limit the potential spread of material, and/or restore the integrity of the container or containment system. The CMUs and their associated containment systems are also visually inspected for the presence of cracks and gaps that could result in loss of containment effectiveness. Should structural problems occur that would allow leakage out of the unit or between compatibility segregation areas, or that may develop into a major failure, wastes would be relocated as necessary and repair activity will be initiated. CSA # 1 will be inspected for proper drainage controls. During scheduled inspections, the CMUs and their associated waste staging loading and unloading areas are visually inspected to determine that adequate aisle space is maintained. Individual containers are also inspected in preparation for the storage of wastes with a different waste compatibility class. Individual containers in the CMUs, subject to Subpart CC requirements, are inspected for Level 1 compliance. In this case, the area is checked to determine if any waste residue remains to an extent that it may react with wastes of a different compatibility class and require decontamination of the area prior to its change of use.

The CMUs (including trenches and containment system sumps) are inspected for the presence of liquids/solids. Spilled solids are removed in accordance with the requirements of the Contingency Plan. Liquids discovered in the collection trenches on the truck unloading aprons at the Containment Building are removed within 48 hours of discovery. If necessary, absorbent materials are utilized to absorb standing liquid for proper disposal. If necessary, sampling and analysis of materials removed from the containment areas is conducted in accordance with Section C.2 of the facility WAP.

F.2.b.(2) Tank System Inspection

Figure F-2 is the inspection form for the RCRA tank system (T-1, T-2, T-3, and T-4) and associated piping. Figure F-2a is the daily inspection form (when in use) for the Containment Building- Stabilization Portion Mixing Bin Tanks (MBT-1, MBT-2, MBT-3, MBT-4).

F.2.b.(2)(a) Tank System External Corrosion and Releases

All permitted external tanks, piping, valves, and connections are visually inspected for signs of leakage, corrosion, or structural deterioration. The leachate piping from landfill cells to the tanks, and from the tanks to the Evaporation Pond are inspected only when in use (i.e., when material is being transferred). Should discrepancies be identified, corrective measures would be implemented.

F.2.b.(2)(b) Tank System Construction Materials and Surrounding Area

The area immediately surrounding the externally accessible portion of the tanks, including the secondary containment, is inspected to detect any erosion or releases. Should any signs of significant erosion or a release be detected, corrective measures will be implemented.

F.2.b.(2)(c) Tank System Overfill Control Equipment

Overfill prevention devices and pressure/vapor venting equipment on tanks are checked for proper operation. Valves are also checked for closing and securing mechanisms, and tank labels are checked for correctness. Additionally, liquid level indicators on all tanks are inspected to verify they are functioning and that no leaks or obstructions have developed.

F.2.b.(2)(d) Tank System Monitoring and Leak Detection Equipment

All tanks and piping are above ground and do not have leak detection equipment. Although above ground piping is not required to employ leak detection equipment, in accordance with IDAPA 58.01.05.008 [40 CFR §264.193(f)(1)], secondary containment systems for the tanks do require leak detection (IDAPA 58.01.05.008 [40 CFR §264.193.(b)(2) and (c)(3)]). All monitoring and leak detection is done by visual inspection, as described in paragraphs F.2.b.(2).(a), (b), and (c).

F.2.b.(2)(e) Tank System Cathodic Protection

Not Applicable. All tanks are above ground.

F.2.b.(2)(f) Additional Tank System Inspection

The structural condition of the tanks are periodically ultrasonically tested per the frequency shown in Table F-1. Inspections of the interior condition of tanks require transfer of the entire contents of each tank and temporary removal from service.

Ultrasonic testing is performed on all steel tanks to obtain wall thickness. A minimum of two (2) representative thickness measurements are obtained in each ring section. If there is more than one plate per ring, at least one (1) representative thickness reading is obtained from each plate. Two (2) representative thicknesses are also obtained for the top and bottom tank shells. These tests are performed by a qualified testing company in accordance with current industry standards.

Tank testing results and the maintenance records of equipment and structures used in the tank system are maintained at the facility for a minimum of three (3) years.

F.2.b.(3) Waste Pile Inspection

Not Applicable.

F.2.b.(4) Surface Impoundment Inspection

Figure F-3 is the inspection form currently used for surface impoundment inspections (Collection Pond #'s 1 and 3 and Evaporation Pond) in accordance with IDAPA 58.01.05.000 (40 CFR §§264.226(b), 264.226(c)).

F.2.b.(4)(a) Condition Assessment

Surface impoundments are visually inspected daily and after a 0.5 in. rain event for freeboard (overtopping control), dike integrity, structural integrity, leakage, erosion, and liner integrity. Surface impoundments are also inspected visually for any sudden and/or unaccountable loss of contents, signs of erosion, and containment system deterioration. Use of a double-lined impoundment design at the facility also serves as a leak detection system for each impoundment. This inspection includes the notation of the presence and volumes of liquids collected in the leak detection system, as well as any system malfunctions. Should the quantity of liquid detected in the system exceed the warning leakage rate (WLR), then the Response Action Plan (RAP) will be implemented. WLR's are listed in the RAP.

If a significant structural problem (as described in the following paragraphs) is detected, the contents of the impoundment may be removed, as necessary, to allow maintenance and repairs. Inspection activities are conducted per the frequency shown in Table F-1.

F.2.b.(4)(b) Structural Integrity

A structural integrity problem is defined as either dike deterioration sufficient to cause potential failure of the dike, a breach in the lining causing a recognizable loss of volume, or anchor trench failure. All surface impoundments are inspected for structural integrity, including areas of the dikes providing freeboard. The liquid level within the surface impoundment may be lowered to allow for in-place repairs. When the impoundment is out of service for more than six (6) months, the structural integrity of the containment dikes are inspected by a qualified engineer prior to returning the unit to service. In accordance with IDAPA 58.01.05.008 ((40 CFR §264.226 (c)), the qualified engineer provides a certification that states that the dikes will withstand the stress of the pressure exerted by the type(s) and amount(s) of material to be placed in the impoundment.

F.2.b.(5) Incinerator Inspection

Not Applicable. The facility does not have an incinerator.

F.2.b.(6) Landfill Inspection

Figures F-4, F-4d, F-4e, F-4f, F-4g, F-4h, F-4i, F-4j, and F-4k are the inspection forms utilized during the inspection of active landfill areas (Cells 14,15, and 16). All inspections are conducted pursuant to IDAPA 58.01.05.008 (40 CFR §264.303(b)). Post-closure inspections are performed in accordance with paragraph I.3.of Section I (Closure/Post-Closure Plan). Figures F-4a, F-4b, F-4c, and F-4h are the inspection forms utilized during inspection of closed landfills (Cell 5, Trenches 10 and 11, and PCB Trench 4). Figures F-16 and F-17 are the post-closure inspection forms for Cells 14 and 15. Inspection activities are conducted per the frequency shown in Table F-1.

F.2.b.(6)(a) Run-On and Run-Off Control System

During landfill inspections, the landfill run-on/run-off control systems are inspected for evidence of deterioration, malfunction, or improper operation. Particular attention is given to the integrity of

containment dikes (where present) and to any blockage of the drainage channels, swales, culverts, and other drainage structures.

F.2.b.(6)(b) Wind Dispersal Control System

Wind dispersal and dust control measures at the facility are inspected for adequacy and effectiveness. This activity includes both a visual inspection and determination of whether the condition of any exposed waste is a wind dispersal issue. When sustained wind speed conditions exceeding 25 mph (25 mph average for an hour) are confirmed, the spreading of hazardous waste will cease, however, wind dispersal control activities may continue (asphaltic emulsion, non-hazardous wastes, non-hazardous liquids, or soil cover) and may be applied on the freshly spread landfill surface. Hazardous waste placement operations will resume only after the sustained wind speed condition is below 25 mph. Landfill cover is also inspected during this activity.

F.2.b.(6)(c) Leachate Collection and Removal System

Leachate collection and removal systems (LCRS) and secondary leak detection, collection, and removal systems (LDCRS) of Landfill Cells 5, 14, 15, and 16 are inspected for the presence of liquids using the inspection forms shown in Figures F-4e, F-4f, F-4g, F-4h and F-4i. In the event the quantity of liquid detected in the LDCRS exceeds the WLR, then the procedures defined in the RAP will be implemented.

The exposed liner surfaces (if any) are visually inspected for damage and monitored for operations that could affect the integrity of the liner.

F.2.b.(7) Land Treatment Facility Inspection

Not Applicable. The facility does not have any land treatment operations.

F.2.b.(8) Stabilization Facility Inspection

Figure F-5 is the inspection form utilized in the inspection of the Stabilization Facility

The truck loading and unloading areas are inspected for any obstructions or spillage. General housekeeping items in this area are also noted. Ramps are inspected for spillage, structural integrity, and obstructions. Sumps are inspected for the presence of liquid or waste material. Secondary containment (i.e., concrete) is also inspected for spillage and for cracks and gaps that could result in loss of containment effectiveness.

The Stabilization Facility equipment (e.g., silos and hoods) is visually inspected for proper operation and structural integrity. The Stabilization Facility is visually inspected for spills and any potentially unsafe conditions resulting from the lack of, or malfunction of, safety guards, shields, or controls. As this area is also used for container management, the inspection schedule for containers in storage in the Stabilization Facility is dictated by paragraph F.2.b.(1). This area is also utilized as a waste staging, loading, and unloading area and, as such, the inspection requirements for these areas of the Stabilization Facility are outlined in paragraph F.2.b.(10).(e).

F.2.b.(9) Containment Building Inspections

Figures F-6 and F-7,present the inspection forms for the Containment Building (the Stabilization and Debris portions). These forms provide a detailed listing of the inspection areas and potential discrepancies for each area inspected. The Containment Building is operated in accordance with IDAPA 58.01.05.008 (40 CFR Part 264 Subpart DD).

The daily inspections of the Containment Building are performed only for those equipment/areas of the buildings in use on the day of the inspection (i.e., operational day). The daily inspections provide for an inspection of the areas directly affected by the operations at the containment buildings. As part of this activity, processing equipment, drip pans, containers, doors, floors, and walls are visually inspected for structural integrity. The work areas are also assessed for spillage and for general condition.

Inspections will be performed daily (when in use). All areas of the building (both Stabilization and Debris portions) must be inspected at least weekly. This includes the leak detection and dust collection systems located in the Containment Building.

Storage areas and containers within the Containment Building are inspected for integrity and any signs of leaks or spills as outlined in paragraph F.2.b.(1) of this Section. As these buildings are permitted as a Containment Building, most waste containers (excluding containers subject to 40 CFR Subpart CC controls) may be stored either open or closed. The air pollution control (APC) systems must be in operation for wastes to be stored in open containers. Containers subject to 40 CFR Subpart CC controls must be kept closed during storage, as applicable. The LCRS and/or LDCRS are inspected for liquids. Any pumpable liquids in the LCRS with a depth of 4" inches or greater (>4") are removed and the removed volume noted on the inspection form. Minor amounts of liquids from condensation are expected in these systems. Liquids in the LCRS and LDCRS are removed and properly disposed in accordance with Section C.2.4.8 of the facility WAP.

The concrete wear/work surface is expected to wear and develop spalling and/or cracking as a normal part of the operation. This wear is considered to be acceptable as the wear surface serves to protect the HDPE liner and does not in and of itself constitute the primary or secondary barrier for containment. Cracks in the working surface of the concrete are monitored periodically so they do not impair the safe operation of the containment buildings. Significant cracks in the concrete working surfaces are documented during the inspections and repaired as part of routine maintenance. The repairs are documented in the facility operating records.

The concrete wear surface associated with the primary barriers is inspected for cracks, gaps, corrosion or deterioration. Any distortion/displacement (horizontal) in the concrete surface in excess of ¾ inches, will be additionally inspected by a qualified engineer. Such review will occur within five (5) working days of initial discovery. After its initial discovery, a distortion/displacement of greater than ¾ inches will be checked monthly. If the distortion/displacement equals or exceeds 1½ inches, all activities in that section of the Containment Building will be suspended. At this point, a qualified engineer will be consulted to provide a determination as to which waste processing activities may proceed while appropriate repairs are being implemented (based upon visual inspection of the distortion/displacement) and to determine the criteria for resumption of normal operations in the affected areas. The engineer will provide a written structural assessment regarding the affected area. This assessment will include requirements for repair and an opinion as to the potential that the underlying HDPE liner has been damaged as a result of the distortion/displacement. Within ten (10) working days of receipt of the assessment report, USEI will prepare a work schedule for all required repairs and will submit the assessment report and repair work schedule to the Director. The assessment report, work schedule, and documentation of repair completion will be maintained on-site in the operating record as described in paragraph F.2.a.

In addition, the inspection will include visual verification that the bottom steel wear plate is not distorted and exposing the support media (gravelly sand) or causing the support media to shift and potentially become contaminated. If the media must be removed because of the distortion or damage to the bottom wear plate, it will be managed as detailed in Section D.

The two (2) Mixing Bin Tanks located in the Containment Building- Stabilization Portion and the two (2) Mixing Bin Tanks located in the Containment Building- Debris Portion are inspected daily (when in use) in accordance with 40 CFR Part § 264 Subpart J. This inspection includes the secondary containment

systems liquid level (and removal, if appropriate), structural integrity such as damage, heaving or settling, spills and housekeeping. These inspections are documented on Figure F-2a.

F.2.b.(10) Other Area Inspections

The following paragraphs detail the inspection requirements for those miscellaneous items required for proper operation of the facility.

F.2.b.(10)(a) Vehicle Wash Area Inspection

The vehicle wash (site decontamination) area is inspected for significant equipment malfunctions, drainage problems or leaks, and for the presence of liquid in the sumps. Figure F-8 is the site vehicle wash inspection form.

F.2.b.(10)(b) Road, Drainage, and Run-On/Run-Off Inspections

Figure F-9 is the current inspection form utilized for access roads and drainage systems. Road, drainage, and run-on/run-off inspections are conducted at the frequency shown on Table F-1.

The condition of the facility roads are inspected to provide for the safe movement of materials within the facility. Any deterioration of the road system which is detrimental to waste transport or which may impact underlying past practice units is repaired as warranted.

Run-on/run-off control and drainage systems for the entire site, including specific units, are assessed for their operational integrity and function.

F.2.b.(10)(c) Gate/Fence Inspections

Figure F-10 is the inspection form for the gates and fences at the facility. The perimeter fence is checked for damage, obstructions, unsecured gates and evidence of forced entry, and all warning signs are inspected for legibility. Any substantive deterioration or malfunction of the fence, gates, signs, or locks is noted and corrected.

F.2.b.(10)(d) Scale Area Inspections

Figure F-11 is the inspection form for the scale area. The truck scale is used for weighing trucks that enter and leave the facility. No waste handling, loading or unloading is conducted in the truck scale area. The area surrounding the scales should be free of waste. In the event of hazardous waste spillage in either of the scale areas, the spill is promptly cleaned up and the area is restored to normal operating conditions.

F.2.b.(10)(e) Waste Staging/Unloading/Loading Area Inspections

Figures F-1, F-7, F-12, F-19, F-20, F-21, and F-22 are the forms utilized in the inspection of the various material staging/loading/unloading areas at the facility. These areas, listed below, which include:

- CSA # 1
- CSP # 4
- CSP # 5
- Pad 6
- RCRA(Pad 7)/PCB Storage Building
- Containment Building (Stabilization and Debris portion)
- Surface Impoundments
- Truck Unloading Apron #'s 1, 2 and 3 at the Containment Building
- Stabilization Facility and Stabilized Roll-Off Containers
- RCRA Tanks Area

- Cell 14
- Cell 15
- Cell 16

These areas were designed with containment and/or drainage capabilities to prevent off-site migration of material. To minimize potential spillage during unloading, loading, and mixing of waste, a combination of splash plates, elevated sidewalls, and covers are utilized with roll-on/roll-off containers. The structural integrity of these items is inspected when waste materials are being handled. The presence of adequate aisle space is also inspected.

F.2.b.(10)(f) Monitoring Well Inspections

Figure F-13 is the form utilized for inspection of monitoring wells located at the facility. Wells are inspected to verify they are locked and undamaged. Inspection activities are conducted per the frequency shown in Table F-1.

F.2.b.(10)(g) Leachate Treatment and Piping System Inspection

Figure F-24 is the form utilized for inspection of the leachate treatment system, located adjacent to Pad 4, and associated piping. The leachate treatment system is inspected for proper pressure gauge readings to ensure a consistent flow of treated and untreated leachate. The piping system is inspected for any damage, which may result in leaks.

F.3 Equipment Requirements

F.3.a Specific Equipment Requirements

In accordance with IDAPA 58.01.05.008 and 58.01.05.012 (40 CFR §§264.32 and 270), the facility is equipped with:

- Internal communication system (i.e., hand-held radios)
- Civil Defense Siren
- External communications such as cellular telephones
- Portable fire extinguishers
- Additional fire control equipment, including water supply
- Spill control equipment
- Decontamination supplies

All equipment is inspected per the frequency shown on Table F-1.

F.3.a.(1) Internal Communications

Figure F-14 is the form utilized for the inspection of communication equipment. The facility's two-way radios are continually in use; therefore, the operating status is known at virtually all times. Two-way radios are used by site security and operations personnel when they are working in active waste handling areas. The inspection of communication equipment is conducted at the frequency shown on Table F-1.

The facility is also equipped with a civil defense siren that can be heard throughout the facility. The siren is radio-controlled and can be activated by a radio key pad. The siren location is shown on Drawing # PRMI-T10.

F.3.a.(2) External Communications

Figure F-14 is the form utilized for the inspection of communication equipment. The facility is equipped with telephones that operate as the primary external means of communication. There is a telephone located at the security building that can be used by security personnel to contact local police and fire departments or state and local emergency contacts. Additional telephones are available at other locations throughout the facility. As the telephones on the site are continually in use as part of normal operations, their operating status is known at virtually all times. Cellular telephones may also be used at the facility. These telephones are not inspected on a regular schedule since they are in continual use.

F.3.a.(3) Emergency Equipment

Emergency equipment at the facility includes fire extinguishers, spill control kits, and decontamination equipment. General site emergency equipment is located throughout the facility to facilitate timely and adequate response to emergency situations.

All emergency equipment in active waste management areas is inspected to assess operable condition. Additionally, the remaining quantity of certain consumable emergency equipment is determined during inspection activities. Figure F-14 is the inspection form used for the emergency equipment inspection. Drawing # PRMI-T10 shows the location of emergency equipment. The emergency equipment maintained on site will change from time to time based on the types of waste managed and associated response procedures.

F.3.a.(4) Water for Fire Control

Figure F-14 is also the inspection form used for the tanks that store water for fire protection. The facility maintains two 16,000-gallon above-ground water tanks, and one 25,000-gallon above-ground water tank that store water for general site usage and in case of fire. A minimum of 16,000 gallons of water is maintained in these tanks to provide fire protection. Supplemental water is also maintained at the site's water holding pond located on Lemley Road. Additionally, an underground pipeline is utilized to transfer water from the holding pond to the facility water tanks.

F.3.b Aisle Space Requirement

Figures F-12 F-19, F-20, F-21, and F-22 outline inspections of staging/loading/unloading areas with respect to aisle space. During scheduled inspections of the CMUs, containment building units, and the waste staging, loading, unloading areas, visual inspection is made as required in paragraphs F.2.b.(1) and F.2.b.(10).(e) with regard to aisle space. Aisle space requirements are provided in paragraph D.1.c.(3).

and bulk shipments of solid and liquid wastes. Therefore, each type of waste shipment is addressed separately.

Attachment 6

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F.4 Preventive Procedures, Structures, and Equipment

F.4.a Unloading Operations

In accordance with IDAPA 58.01.05.012 (40 CFR §270.14(b)(8)(i)), unloading procedures for waste shipments utilize safe and environmentally-sound methods to process and dispose of waste material. The facility handles both containerized and bulk shipments of solid and liquid wastes. Therefore, each type of waste shipment is addressed separately.

F.4.a.(1) Bulk Solids Unloading

All bulk solids unloading operations are performed under the direction of facility personnel. All personnel involved in unloading operations are trained in the handling of hazardous materials and are required to wear appropriate safety equipment.

Upon entering the site, transportation vehicles normally proceed to the Truck Scale and then to the staging area. After inspection and acceptance, each vehicle is directed to its designated unloading area. When a transportation vehicle arrives at the unloading area, an employee typically assists the driver in positioning of the vehicle. This allows control of vehicle movement by facility personnel while the vehicle is on-site. Prior to unloading, wind conditions and waste material type are assessed to determine if dust control measures are appropriate. Bulk solids are unloaded at the appropriate waste management area.

F.4.a.(2) Bulk Liquid Unloading

After inspection, compatibility testing, and acceptance, each vehicle is directed to the designated unloading area at either the tank storage, surface impoundment, or treatment unit. Prior to off-loading of wastes into tanks, surface impoundments, or treatment systems, the compatibility of the new waste is determined in accordance with the procedures in the WAP.

All bulk unloading operations are performed under the direction of facility personnel. All personnel involved with unloading of bulk liquid wastes don the proper PPE prior to the off-loading of waste material. Each transportation vehicle is positioned in a stable manner prior to unloading. It is then grounded to reduce the possibility of static electrical discharge. For bulk liquid truck unloading operations, all hose and piping connections are secured and checked prior to unloading. After all connections are checked for proper fit and tightness, valves are checked for proper operation and waste unloading begins. All connections are monitored during the unloading process for any evidence of leakage or other possible problems.

When a waste material is to be stored in one of the tanks, the tank identification, quantity, and work order number of the waste is recorded in the operating records. When a waste material is transferred to the surface impoundment or a treatment system, the quantity and work order number of the waste is recorded in the operating records.

Several control procedures are utilized to provide for the proper bulk handling of multiple liquid materials. By following the WAP, established procedures are used to determine the chemical and physical characteristics of each waste so adequate information has been obtained for the proper and safe management of the waste. Individual waste streams are accepted and processed for management in specified units. These units are designated to service specific wastes so only compatible wastes are managed in the same unit. This batch method of operation minimizes the potential for mixing of incompatible waste materials. Batch operation also facilitates the safe operation of treatment units. Prior to introduction of a different waste compatibility type, compatibility is checked in accordance with Section C.6.5 of the facility WAP.

Liquid waste shipments that are not compatible with materials of construction of the management unit or with the materials currently stored in the management unit are evaluated for storage in a different unit at the facility. Wastes that are not compatible and are not suitable to be managed at the facility are rejected and either returned to the generator or shipped to an alternate facility.

F.4.a.(3) Containerized Waste Unloading Procedures

Upon arrival at USEI, transportation vehicles normally proceed to the Truck Scale and then to a staging area for preparation for unloading. Each vehicle then proceeds to its designated unloading area under the direction of site personnel. Facility personnel in the unloading area are instructed with respect to proper PPE for use in handling the incoming waste material based on the Waste Profile Form (WPF) or Work Order as appropriate. All handling of containers at the facility is performed with the appropriate equipment. When individual drums are transported from one area of the facility to another, a bobcat, drum dolly, or other appropriate piece of drum handling equipment is utilized. When multiple drums on wooden pallets are moved or staged in another area, a front-end loader, forklift or other appropriate equipment is used.

If an incoming transportation vehicle is carrying containerized waste that is to be placed into a CMU, the vehicle proceeds under the direction of facility personnel. The vehicle is positioned on a stable unloading area and all containers are removed from the vehicle with appropriate container handling equipment.

Each incoming container is visually inspected for integrity and to verify that labeling and marking are complete with respect to container identity. Containers that do not conform to these guidelines are designated for further processing and identification and/or repackaging, if necessary. Containers that cannot be identified or whose discrepancies cannot be resolved are either re-characterized, returned to the generator, or sent to an alternate facility.

Upon acceptance at the staging/storage facility, individual containers may be placed on pallets, as needed. Prior to initiating work in the storage area, all personnel don the appropriate PPE. If the material is ignitable or reactive, appropriate precautions are taken as detailed in paragraph F.5 .

F.4.a.(4) Unloading at Stabilization Facility

Waste determined to be suitable for stabilization may be forwarded directly to the Stabilization Facility. Each waste to be stabilized is evaluated in accordance with the facility WAP to evaluate treatability and handling requirements After the determination of acceptability, the waste transport vehicle is directed by facility personnel to the proper unloading location.

Procedures set forth in F.4.a.(1) and F.4.a.(2) are also followed when the waste arrives at the Stabilization Facility.

F.4.a.(5) [Reserved]

F.4.b Run-Off

Site drainage and run-off controls are designed to convey and control rainfall from a 25-year, 24-hour precipitation event. Active waste disposal, storage, and treatment operations are segregated from stormwater by a series of berms, interceptor channels, engineered grades, and collection ponds.

Rainwater from within the perimeter road is impounded or directed to Collection Pond #1 or 3 by interceptor channels and engineered grades.

Rainwater from outside the perimeter road is directed off-site by grade, interceptor channels, and berming. The perimeter road berms generally prevent run-on to the facility.

Appendix D.4.7 contains further discussion on run-on/run-off control.

F.4.c Water Supplies

To the best of USEI's knowledge, there are no domestic groundwater drinking water sources within 3,000 feet of the facility. The run-on and run-off control systems and the waste handling operations have been designed to prevent the contamination of either domestic groundwater drinking supplies or surface-water supplies. All treatment and disposal activities take place in areas that are sloped and graded to prevent uncontaminated off-site water from entering the site, as well as to prevent run-off from leaving the facility.

F.4.d Equipment and Power Failure

In the event of a power outage, certain site processes are shut down. However, operations which do not require electrical power can usually continue unimpeded. Portable lighting is used, if necessary, to provide safe working conditions. Mobile radios are battery powered to provide uninterrupted communications.

F.4.e Personal Protection Equipment

Personal protective equipment (PPE) is issued to individual employees to provide protection beyond that afforded by the engineered safety controls described throughout this document. This PPE may include the following:

- Respirator Protection
- Foot Protection
- Head Protection
- Eye Protection
- Hand Protection
- Coveralls, Tyvek, and chemical resistant outer coverings

Facility personnel are trained in the appropriate use of PPE for each individual working area and condition. Special requirements for specific waste streams are designated by the Health & Safety Manager or are listed on the WPF and/or the Work Order as discussed in applicable sections of the facility WAP. Facility personnel are fit tested for respirators and instructed regarding the use of applicable safety equipment. If an employee notices a defect, it is their responsibility to request replacement of the defective equipment. If any employee determines a particular task does not comply with safe operating practices, it is their responsibility to notify their supervisor of the task in question. To facilitate this process, all employees are trained in the safe operating practices to be used in handling hazardous materials.

F.4.f Decontamination Procedures

A vehicle wash station is provided for washing/decontaminating equipment. This unit is also used to spray vehicles that traverse the landfill or other designated waste handling areas. This system is used to avoid tracking material off-site.

Personnel are instructed to clean waste handling equipment in designated areas prior to exiting designated portions of the facility.

F.5 Prevention of Reaction of Ignitable, Reactive, and Incompatible Wastes

The processing, storage, treatment, and disposal of ignitable, reactive and incompatible wastes pose various handling problems. USEI makes every effort to prevent any reaction involving ignitable and reactive waste and to minimize the opportunities for the mixing of incompatible wastes.

F.5.a Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste

In accordance with IDAPA 58.01.05.012 and 58.01.05.008 and [40 CFR §§270.14(b)(9) and 264.17], and prior to handling ignitable material, USEI makes every effort to eliminate any potential situation which could cause an ignition of reactive or ignitable waste.

Prior to handling any reactive or ignitable waste, personnel will survey the immediate work area for any sources of ignition, open flame, or any other potential problems which may lead to a possible uncontrolled event. These sources include, but are not limited to, open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks, spontaneous ignition and radiant heat. These sources are removed from the work area. If handling equipment is used, only equipment that is compatible with the material is used. Transportation vehicles are turned off and secured to prevent movement, and tankers are grounded to prevent static discharges. Each work station is equipped with the appropriate fire-fighting equipment to handle minor incidents. Smoking is not permitted in any waste handling area. A “No Smoking” sign is clearly posted at the entrance of the active yard area. Personnel can contact the area supervisor by two-way radio or other means in the event of an uncontrolled event. These and other emergency equipment maintained on-site are described in detail in the Contingency Plan.

F.5.b General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste

Every effort is made to minimize the potential for adverse reactive situations at the facility. Incompatible waste categories are handled separately at a given unit/sub-unit. All materials handling and processing equipment are decontaminated, as necessary, following activities with each waste category. Decontamination procedures for each change of waste category handling are determined by operations supervisors. Incompatible wastes are segregated by compatibility group via physical separation (barriers, berms, or dikes). Batch treatment techniques for individual categories of wastes (one compatibility group at a time) are utilized to minimize the adverse effects that may result from processing incompatible, reactive, or ignitable waste streams.

Incompatible wastes are not stored together in containers or placed in contact with each other in surface impoundments or landfills at the facility. Wastes are tested or evaluated using the waste characterization/acceptance process for compatibility (as described in the WAP) prior to acceptance of the material at the facility. Individual waste shipments with uncertain properties are sampled and tested for compatibility prior to contact with other wastes or equipment. EPA-600/2-80-076, “A Method for Determining the Compatibility of Hazardous Wastes,” was used as a guideline in developing compatibility categories for the management and processing of hazardous wastes. The criteria used for developing these categories were established to avoid producing a potentially dangerous situation. Hence, wastes are segregated from other incompatible wastes that, when contacted, could result in an adverse reaction, including any of the following:

- Generation of extreme heat or pressure, fire or explosions, or violent reactions.
- Production of uncontrolled flammable fumes, dusts or gases in sufficient quantities to threaten human health or the environment.
- Production of uncontrollable flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion.
- Damage to the structural integrity of the device or facility.
- Creation of a threat to human health or the environment.

Segregation of potentially incompatible wastes in the landfill is facilitated by facility review of each waste stream (per requirements of the facility WAP) and utilization of the Work Order. When wastes are received and fingerprinted, the chemist will note on the Work Order any considerations of incompatibility. Conditions of incompatibility are not a concern where wastes have been treated to meet LDR standards. These wastes are in a physical state in which no adverse reactions will occur when the material is placed into the landfill. However, USEI also receives non-regulated materials for direct disposal (i.e. solid corrosives) that may be incompatible. To meet the requirements of 40 CFR §264.17(b) within the landfill cells, materials that may pose a potential for adverse reactions are segregated within separate subcells within the landfill. To create the subcell, any potentially incompatible materials are placed at least three (3) feet away from other materials. The space between materials is then filled with Group E material or clean fill. Group E or clean fill is packed around each container to create a totally separate and segregated area for these wastes within the landfill cell. If Group E material is used as fill material it must be inert and non-hazardous soil meeting LDR. Confirmation screening will be performed to verify that the fill soil is not flammable, combustible, or reactive prior to use as fill.

F.5.c Management of Ignitable or Reactive Wastes in Containers

Prior to acceptance of any wastes, USEI uses the management system described in the facility WAP to determine the status for acceptance or rejection or acceptance of materials for disposal on-site. This system is designed to provide USEI the necessary precautions to avoid accepting ignitable, reactive, or incompatible wastes.

Any ignitable or reactive wastes are stored in segregated areas and comply with the requirements of 40 CFR §264.17(c). Paragraph D.1 of Section D identifies the locations of the waste management areas and processing areas. Per IDAPA 58.01.05.008 and 58.01.05.012 (40 CFR §§270.15(c) and 264.176), no ignitable wastes are stored or treated within 15 meters of the property line.

F.5.d Management of Incompatible Wastes in Containers

As pursuant to IDAPA 58.01.05.008 and 58.01.05.012 (40 CFR §§264.177, 270.15(d)) the mixing of incompatible wastes in containers is not permitted unless §264.17(b) is complied with. In accordance with the applicable section of the facility WAP, each waste entering the facility is tested and its destination noted on the Work Order. All containerized waste is separated from other incompatible waste via physical separation barriers (e.g., dikes, berms, or walls). Any waste container that is reused for future waste handling purposes is properly cleaned prior to reuse.

Bulk or containerized waste was previously stored within the Containment Building in designated areas. Segregation of incompatible wastes was maintained during storage and/or staging for processing. Only one compatibility group at a time was processed in each sort floor and mixing bin area. When waste spills occured, the spill material was collected, removed, and the area appropriately cleaned prior to any staging and/or processing of incompatible waste within the area. No additional waste containers will be placed into storage at the Containment Building until the building is reconstructed.

F.5.e Management of Ignitable or Reactive Wastes in Tank Systems

Not Applicable. The facility manages ignitable and reactive wastes per the requirements of Section C.6.4 of the facility WAP.

F.5.f Management of Incompatible Waste in Tank Systems

Prior to the addition of a new waste stream into a tank, a waste to waste compatibility test is performed as required by the applicable sections of the facility WAP. If an incompatibility is determined, the new waste stream is not accepted into that tank as per IDAPA 58.01.05.012 and 58.01.05.008 (40 CFR §§264.199, 270.16(j)) unless §264.17(b) is complied with.

When an empty tank is designated to hold a compatibility group different than it previously held, appropriate cleaning and/or evaluation is performed before introducing any of the new compatibility group waste into the vessel. Cleaning procedures may include washing the inside of tanks and collecting the wash solution. These wash solutions may be treated as hazardous wastes if they exhibit a hazardous waste characteristic. The tanks are washed and/or emptied sufficiently so that when added to the tank, the new waste does not react with the waste wash water. Tests may be run on the wash water to verify adequate tank cleaning, to determine the degree of hazard and/or to determine disposition.

F.5.g Management of Ignitable or Reactive Wastes Placed in Waste Piles

Not Applicable. The facility does not have any waste piles.

F.5.h Management of Incompatible Wastes Placed in Waste Piles

Not Applicable. The facility does not have any waste piles.

F.5.i Management of Ignitable or Reactive Wastes Placed in Surface Impoundments

Not Applicable. The facility does not accept ignitable or reactive wastes for management in surface impoundments.

F.5.j Management of Incompatible Wastes Placed in Surface Impoundments

Material designated for disposal in a surface impoundment is tested for compatibility with the material already in the unit, as required by the facility WAP. If, through testing, the wastes in question are determined to be incompatible and would result in generation of heat or fire, production of toxic or flammable emissions, damage to the unit's structural integrity, or threaten human health or the environment, the new material is not introduced into the surface impoundment as per IDAPA 58.01.05.012 and 58.01.05.008 (40 CFR 270.17(h), §§ 264.229) unless §264.17(b) is complied with.

F.5.k Management of Ignitable or Reactive Wastes Placed in Landfills

The facility does not accept air and highly water reactive wastes for direct placement in the landfill as described in the facility WAP. In accordance with the WAP and per IDAPA 58.01.05.012 and 58.01.05.008 (40 CFR §§270.21(f), 264.312), no ignitable or reactive hazardous waste is placed in a

landfill unless it is treated or otherwise rendered non-ignitable or non-reactive. All incoming hazardous wastes are properly characterized and, if stabilization or treatment is required prior to placement in a landfill, special instructions are placed on the Work Order to clearly state the process to be followed.

F.5.l Management of Incompatible Wastes Placed in Landfills

Wastes are not placed in contact with other incompatible wastes in the landfill as per IDAPA 58.01.05.012 and 58.01.05.008 (40 CFR §§270.21(g), 264.313). The identification and segregation of potentially incompatible wastes in the landfill is accomplished by the review of each waste stream in accordance with the WAP. Additional precautions to avoid mixing of incompatible wastes in landfills is provided by the waste locator system as described in paragraph D.6 of Section D.

F.5.m Management of Ignitable or Reactive Wastes Placed in Land Treatment Units

Not Applicable. The facility does not have any land treatment units.

F.5.n Management of Incompatible Wastes Placed in Land Treatment Units

Not Applicable. The facility does not have any land treatment units.

Attachment 7

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Contingency Plan
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List of Tables

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G.0 Contingency Plan

The information contained herein is submitted in accordance with the requirements of IDAPA 58.01.05.008 and 58.01.05.012 (40 CFR 264.50 through 264.56 and §§270.14(b)(7)). These regulations require facilities that treat, store, or dispose of hazardous wastes to have contingency procedures to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, groundwater, or surface water at the facility. The provisions of this Contingency Plan are implemented when it is determined that an event could threaten human health or the environment. A copy of the Contingency Plan is maintained at the facility and has been submitted to all agencies which may be called upon to provide emergency services.

During the period of the permit, changes may be made to the facility that necessitate changes in drawings of physical layouts/plans in the Contingency Plan. These changes in drawings of physical layouts/plans will be submitted to IDEQ and all Contingency Plan holders.

G.1 General Information

This Contingency Plan is for the US Ecology Idaho, Inc.(USEI) treatment, storage, and disposal facility located on Lemley Road, 10½ miles west of Grand View, Idaho. The facility primarily treats, stores and disposes of RCRA Hazardous waste as defined in IDAPA 58.01.05.005 (40 CFR Part 261), TSCA wastes as defined in 40 CFR 761 and other types of solid, non-hazardous and non-regulated wastes. The facility location is shown on Figure G-1. USEI is the operator of the facility.

The facility manages hazardous wastes in a variety of ways:

- Hazardous wastes, including debris, are treated in a variety of units.
- Hazardous wastes are stored in a variety of units.
- Hazardous wastes are disposed of in landfill cells and surface impoundments.
- Storm water run-off is collected in surface impoundments.
- Hazardous wastes are transferred off-site to other treatment, storage, and disposal facilities.

The active waste handling operations at the facility are described in detail in Section D. Pre-RCRA units (historic waste management areas) are identified and described in Section J.

This Contingency Plan is implemented if there is a fire, explosion, or any unplanned release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

G.2 Emergency Coordinators

In accordance with IDAPA 58.01.05.008 (40 CFR §§264.52(d) and 264.55), the facility maintains a list of Emergency Coordinators (ECs). The list of ECs designates a primary contact as well as alternates in the order in which they assume responsibility in the absence of the primary contact. This list of ECs is provided as Table G-1.

At all times there is an EC on the facility premises or on call (i.e. available to respond to an emergency by reaching the facility within a short period of time) who has the responsibility for coordinating all emergency response measures. The EC is thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of wastes handled, the location of all records within the facility, and the facility layout. In addition, the EC has the authority to commit any resources needed to carry out the contingency plan. Each EC is provided a copy of the

Contingency Plan that may be kept at their residence. Table G-2 lists emergency contacts, that may be contacted by the EC in the event of an emergency.

This table, as well as any other emergency contacts and telephone numbers in the Contingency Plan, is reviewed annually and revised as necessary.

In accordance with IDAPA 58.01.05.008 (40 CFR §264.55), ECs are selected based on their familiarity with:

- The Facility Layout
- The Contingency Plan
- Operations and activities at the facility
- Location and characteristics of the wastes handled
- Location of records within the facility

ECs have completed site training requirements, exhibit leadership qualities, and have completed USEI's probationary employment period. Training records and job descriptions of the EC and Alternate ECs are maintained at the facility for review.

This plan describes the actions ECs must or may carry out during any particular incident. The EC may delegate certain activities to other qualified facility personnel (e.g.; outside notifications may be delegated to the Environmental Manager or other qualified facility personnel).

G.3 Initiation of the Contingency Plan

In accordance with IDAPA 58.01.05.008 (40 CFR §§264.52(a) and 264.56(d)), the decision to implement the Contingency Plan depends on whether or not an imminent or actual incident could threaten human health or the environment (e.g., release, fire or explosion). This paragraph provides guidance for making these determinations by specifying decision-making criteria to be used during the implementation of the Contingency Plan. The general response and implementation procedures to be used when an incident occurs and the potential notification requirements are outlined in Figures G-2 and G-3.

The EC can implement the Contingency Plan in full or in part to meet the needs of the particular incident. A full implementation is appropriate if outside assistance is needed from any emergency agency or if complete facility evacuation is warranted. The following situations require either partial or full implementation of the Contingency Plan:

- Fire and/or explosion:
    - A fire involving hazardous waste or hazardous materials that could threaten human health or the environment (does not include small fires incidental to hot work permits or oxidation of gasses from hydrolysis during treatment).
    - The fire spreads and could possibly ignite materials at other locations on-site or could cause heat-induced explosions.
    - The fire could spread to areas outside the facility.
    - A danger exists that an explosion could occur.
    - A danger exists that an explosion could ignite other hazardous wastes at the facility.
    - A danger exists that an explosion could result in the release of toxic material.
    - An explosion has occurred.
    - Any fire or explosion requiring an off-site agency for emergency response.

- Spills or Material Release:

- A spill that results in release of flammable liquids or vapors that could cause a fire or gas explosion hazard.
- The spill causes the release of toxic liquids or fumes that could threaten human health or the environment.
- The spill cannot be contained inside the facility.
- Any spill or material release that requires an off-site agency for emergency response.

A partial implementation is appropriate when the facility has the resources to address the situation without outside emergency resources in a timely fashion.

The EC implements the Contingency Plan and coordinates the activities of available personnel. All facility employees have received training in implementing the Contingency Plan. It is the responsibility of the individual who detects an incident at the facility to promptly contact a supervisor, the EC, or their designee. When contacted, the supervisor will make a preliminary assessment of the situation and, if warranted, will promptly contact the EC. If the primary EC is unavailable, an alternate EC will be contacted (See Table G-1). When work is being conducted without an EC present at the site, the Primary EC will appoint a trained designee to carry out EC duties, including notifications, in case of an emergency. In the event an emergency situation should arise, the EC is responsible for assessing the severity of the incident and implementing the Contingency Plan as required.

Should an incident occur after the normal working hours, the designated EC can implement the Contingency Plan, as appropriate, without being at the facility. To do this, the designated EC uses the observations of personnel and security officers who are at the facility to make preliminary determinations of the appropriate course of action.

G.4 Emergency Response Procedures

G.4.a Notification

In accordance with IDAPA 58.01.05.008 (40 CFR §264.56(a)), upon the discovery of any imminent or actual emergency, the discoverer will promptly notify his supervisor, who will, as necessary, notify the primary EC (or his alternate when the primary EC is unavailable and/or the alternate is a more appropriate contact for the particular situation) of the situation. For afterhours incidents, the primary EC or his alternate is contacted. Specific notification procedures and requirements for the various types of incidents that would require implementation of this Contingency Plan are provided in the other portions of this plan. A facility map is available to assist personnel in providing necessary details to the EC available. If not immediately available at the facility, the ECs have the authority to issue preliminary decisions prior to arriving at the facility. The EC is responsible for contacting the necessary personnel (response team, cleanup crew, etc.) and instructing them how to proceed.

Supervisors of unaffected areas will generally stay with their personnel and be ready to evacuate and account for the personnel under their supervision.

The civil defense siren or other communication systems may be activated to notify facility personnel at the ECs discretion. In the event of a power outage, the radio transponder/repeater is equipped with a battery backup that can last up to 48 hours, depending on usage, , so that radios may still be used for communication. Evacuation may be initiated using radios and/or the civil defense siren. At least two employees working in the active treatment area will be equipped with keypad radios, so that the siren can be activated if needed. Radios are issued in sufficient numbers so that each employee either has a radio or is with an employee who has a radio, including heavy equipment operators. The radios are battery operated and not dependent on electrical power. The siren is located on the Quonset hut.

The EC will contact available supervisors to inform them of the incident. Normal site radio use may also be curtailed to facilitate Contingency Plan implementation. During active emergencies, administrative personnel are instructed to curtail routine business calls so the phone lines will remain open to handle emergency calls. Personnel are assigned to the access gates by the EC to control the access of persons during emergencies. The EC is responsible for contacting the appropriate federal, state, or local authorities if their assistance is required. The EC is also responsible for recording those incidents requiring activation of the Contingency Plan in the operating record(recording incidents in the operating record may be delegated to the Environmental Manager or other qualified facility personnel).

Figures G-2 and G-3 depict the generalized sequence in which the EC, facility personnel, and appropriate Federal, state, and local agencies are to be contacted, respectively. Notification of the appropriate agencies is the responsibility of the EC. Pertinent phone numbers are listed in Tables G-2 and G-3.

If a release, fire, or explosion that could threaten human health or the environment outside the facility or that is beyond the facility's emergency response capabilities to control occurs, the EC is responsible for ensuring the appropriate persons/agencies are notified. The following information is typically given to the appropriate persons/agencies:

- Name and telephone number of the reporting individual
- Name and address of facility
- Time and type of incident (e.g., release, fire)
- Name and quantity of material(s) involved, to the extent known
- Extent of injuries, if any
- Possible hazards to human health or the environment outside the facility

The EC is responsible for calling the Idaho Emergency Communication Center (IECC) (State Comm (800) 632-8000) to request activation of the Idaho Emergency Medical Services (EMS) system, if needed. Based on the type and severity of the reported injury, the IECC will contact the appropriate emergency service and medical facilities. The responding medical unit will direct medical emergency responses once they arrive at the scene. These responsibilities include assessment of the emergency and communication with medical facilities to ascertain which facility the injured person(s) are to be sent for treatment. The EC and medical personnel will evaluate chemical exposures and the need for personnel decontamination prior to leaving the facility. St. Alphonsus Hospital, located in Boise, Idaho, is the Regional Trauma Center. In the event of an emergency, however, the Idaho EMS will decide which hospital is best capable of treating injured persons. Figure G-4 provides general guidance procedures to be used in the event of an injury.

G.4.b Identification of Hazardous Materials

In accordance with IDAPA 58.01.05.008 (40 CFR §264.56(b)) and in the event of a release, the EC will attempt to identify the character, exact source, amount, and areal extent of any release. The initial identification method will include visual inspection, if possible. Paperwork documentation, such as shipping Manifests, Internal Control Forms (ICF), Waste Profile Forms (WPF) and other available sources of information will also be reviewed. Additionally, USEI maintains a database at the site and the corporate office, which allows information to be gathered from two separate locations.

Certain wastes that come into the facility are bulk liquids or solids. Should a problem occur during the unloading, storage, treatment, stabilization, or disposal of these wastes, the material can be identified by the WPF numbers and ICF's associated with these wastes. Bulk wastes unloaded and disposed of within a landfill can be identified using waste disposal records.

Wastes in containers can be identified at the time of their unloading by WPF numbers, during storage by the ICFs and, finally, by their position in the landfill area as indicated in the waste location records.

Wastes being treated in surface impoundments can be identified by manifests and WPF numbers at the time of their deposition and, subsequently, by ICFs.

Wastes being treated or stabilized can be identified by WPF numbers, waste characterization review information, and manifests. Inventory records are maintained for all wastes stored at the facility.

Samples will be taken in accordance with the Waste Analysis Plan (WAP), for chemical analysis if there is a release of materials from containers, tanks, stabilization areas, disposal areas, or surface impoundments that cannot be identified from existing records. Personnel who may have knowledge of the materials involved will be interviewed as necessary.

G.4.c Assessment

In accordance with IDAPA 58.01.05.008 (40 CFR §§264.56(c)) and 264.56(d)), the EC will assess possible hazards, both direct and indirect, to human health or the environment. This assessment will be based on:

- The character of the released material(s)
- The exact source of the released material(s)
- The amount of the released material(s)
- A determination of the areal extent of the released material(s)
- An assessment of the possible hazards to human health and the environment

The information used in making assessments may include:

- EC observations
- Reports from facility personnel
- Manifests
- Operating logs
- Operation records
- Waste characterization data
- Miscellaneous sources of information and response assistance maintained at the facility

Once the area of involvement is identified, the EC will acquire and review the appropriate facility records of the wastes stored, treated, or disposed at the site location, including waste analyses, manifests, and other pertinent data, as needed.

Based on this information, the EC will assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment will consider both direct and indirect effects of the release, fire, or explosion (including the effects of any toxic, irritating, or asphyxiating gases that are generated), of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions, of the possibility of heat-induced explosions and spreading fire, and of the potential exposures of personnel to hazardous materials while attempting to control a fire.

If the EC determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, the EC must report their findings as follows:

- If the ECs assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. The EC must be available to help appropriate officials decide whether local areas should be evacuated; and

- The EC must immediately notify either the Idaho Emergency Communication Center (IECC) (State Comm (800) 632-8000) or the National Response Center (using their 24-hour toll free number 800-424-8802). The report must include:
    - Name and telephone number of the reporter;
    - Name and address of the facility;
    - Time and type of incident (e.g. release, fire);
    - Name and quantity of material(s) involved, to the extent known;
    - The extent of injuries, if any; and
    - The possible hazards to human health, or the environment, outside the facility.

All spills and leaks of hazardous waste greater than the minimum reportable quantity of releases (as defined in 40 CFR §302.4), which do not threaten human health or the environment outside the facility will be reported to the Idaho Department of Environmental Quality (IDEQ) and NRC within 24 hours.

If the EC determines the facility has had a release or explosion which could threaten human health or the environment and deems that an evacuation is necessary, he will contact the appropriate local authorities (see Table G-2) and proceed with evacuation procedures as further addressed in paragraph G.7 of this Section.

G.4.d Control Procedures

In accordance with IDAPA 58.01.05.008 (40 CFR §264.52(a)), potential releases fall under two general classifications: fire/explosions and spills/releases of materials. Natural disasters such as earthquakes or tornadoes could also result in implementation of the Contingency Plan by causing an event that would fall into one of these two classifications. Because of the facility's location and elevation, inundation by flood is not a probable threat. Run-on and run-off from precipitation events are controlled by a system of dikes, ditches, swales, and collection ponds. Site drainage plans for the complete drainage system have been reviewed by USEPA and IDEQ. The subsections that follow discuss specific control procedures utilized in the event of a fire, explosion, or material spill/release. In all emergency procedures, the initial response is to first protect human health and safety, then protect the environment. Identification, containment, treatment, and disposal assessment are subsequent phases to the contingency implementation process.

G.4.d.(1) Fire and/or Explosion

Response personnel will be on standby during all facility emergencies. If a response to a fire has occurred, remote firefighting efforts will concentrate on preventing the fire from spreading to nearby areas. During nonworking hours (evenings, holidays, weekends), the Response Team will be contacted at home. In the event of a fire, USEI's Response Team will only utilize minimal remote fire suppression techniques as appropriate in order to protect the health and safety of the response crew. Figure G-5 outlines the procedures to be used in the event of a fire.

All areas for loading, off-loading, treatment, storage, and disposal are readily accessible by fire-fighting and other emergency vehicles and equipment. The roads leading to the storage, treatment and landfill areas are kept clear of obstructions.

The following general procedures are used for rapid and safe response and control of fire/explosion situations. When an employee discovers a fire or explosion or a situation that could lead to either of these events (spill of flammable material, etc.), they will report it to their supervisor or the EC. When contacted, the EC is responsible for obtaining the following information:

- The area of the fire and/or explosion or the unsafe condition
- The materials involved and the intensity of the fire or explosion if they have occurred
- Any personnel injuries

The following actions will be taken in the areas affected by the fire or explosion:

- Work in all potentially impacted areas will be immediately terminated.
- Complete evacuation of the affected area will be initiated if a threat to human health is possible.
- Medical attention will be obtained for any injured person(s) through Idaho EMS.
- The emergency alarm warning system (civil defense siren), as necessary, will be used to notify site personnel of an emergency condition if it requires site evacuation. This signal also indicates to employees that 2-way radios will be used only for emergency communication and that all facility personnel who are involved with emergency response should turn on their radios at this time. Also, "EMERGENCY" will be called three (3) times over the 2-way radios to provide an open communication line for emergency use.
- If safe to do so, operating equipment will be shut down, feed lines and additional equipment will be shut down, and nearby containers will be removed or isolated.
- If necessary, the area will be cleared of personnel not actively involved in fire suppression. For site evacuation, these persons will report to the designated rally points for accountability. Rally points are designated in Figure G-7. The figure shows that several rally points are established around the site so an area upwind of the fire is available. Additional personnel safety equipment will be distributed if needed.
- If safe to do so, injured persons will be removed from the area and medical treatment will be administered by qualified personnel.
- As appropriate, facilities will be inspected for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment where appropriate and safe to do so.
- Fires may be suppressed with water, soil, or dry chemicals. Heat-exposed containers will be cooled with water spray and removed from the fire, if appropriate and possible. Warning/Caution: If a rising sound comes from a venting device or a tank begins to discolor, withdraw from the area immediately. (Possible Boiling Liquid/Expanding Vapor Explosion).
- IECC will be called if a fire cannot be controlled or is too dangerous for facility personnel (as determined by EC).

Based on the severity of the fire/explosion, the potential for injury to personnel, and the materials involved, the EC will determine if fire suppression activities/explosion response activities can be safely accomplished by USEI personnel. The EC is responsible for assessing all fire-fighting/explosion response efforts.

The EC will determine when the fire emergency has passed and will consult with other facility personnel, as appropriate, before the "all clear" message is sent. The "all clear" message will be communicated to facility personnel via two-way radios or verbally when the fire has been extinguished and the personnel are no longer endangered. All required dedicated equipment used in the emergency will be cleaned and prepared for use prior to being placed back in service as required by IDAPA 58.01.05.008 (40 CFR §264.56(h)(2)).

G.4.d.(2) Spill or Material Release

The following general procedures outline rapid and safe response for the control of spills or material release situations. Figure G-6 outlines the procedures. When an employee discovers a hazardous chemical spill or process upset resulting in a release, he will immediately report it to his supervisor or the EC. When contacted, the designated EC will attempt to obtain the following information:

- Location of the release or spill of hazardous material

- The identity, properties, and characteristics of the material spilled or released
- The direction in which the spill, vapor, or smoke release is heading

- An estimate of the quantity released and/or the rate at which it is being released.
- Any injuries involved

This information is used to assess the magnitude and potential seriousness of the spill or release. If the spill or release is within the facility's emergency response capabilities, the EC will contact and deploy the necessary facility personnel. The EC will contact the appropriate agencies for assistance and reporting.

Because fire is always a potential hazard in spills of flammable materials, possible sources of ignition near the fire will be eliminated, whenever possible. Vehicular traffic will be directed away from the area to avoid ignition of the vapor. Routine work in the area will cease until the spill is contained and safety is restored. If spilled materials are flammable and pose a threat of fire, response personnel may respond with water and hoses for vapor suppression. If advised by the EC , the spill may be flushed with large quantities of water. Materials will be contained and collected for proper treatment and disposal.

If the chances of an impending explosion are high, an appropriate area will be evacuated as determined by the EC. The closest local residence is approximately 1 mile from the site. Therefore, a release of even highly flammable material should not threaten local residences with any danger of fire.

Isolation distances and evacuation requirements are dependent on the nature and magnitude of the spill. Small and large spills are defined using the 2016 edition of the North American Emergency Response Guidebook. A small spill is one which involves quantities less than 55 gallons for liquids and less than 660 pounds for solids. A large spill is one which involves quantities that are greater than 55 gallons for liquids or greater than 660 pounds for solids.

The Contingency Plan will be activated for all spills that could directly threaten human health or the environment. The Contingency Plan may not be activated for small spills that do not exceed reportable quantities (as defined in 40 CFR §302.4) and do not pose a threat to human health or the environment. *De minimis* losses include those from normal material handling/processing operations (e.g., loading and unloading, or leaks from pipes) or other facility operations; these small losses are handled as part of the normal site operations and do not require implementation of the Contingency Plan. Spills and releases into secondary containment are generally not considered to pose a threat to human health and the environment and do not generally require implementation of the Contingency Plan.

The following actions will be immediately taken in the areas affected by a spill or release:

- Initiate complete evacuation of the affected area if a threat to human health is possible
- Clear radio by calling "EMERGENCY" three (3) times over the radio.
- Obtain medical attention for any injured person(s) through IEMS.
- Dispatch emergency personnel to the site to take the appropriate action as needed.
- Contact the proper authorities if the uncontained spill or release directly threatens human health or the environment outside of the facility. Contact the IECC first so that, if necessary, persons downwind or downgradient of the spill or release can be notified and, if necessary, evacuated. If a large spill occurs, the initial evacuation area downwind will depend on the nature and volume of the material spilled. Evacuation distances established by the latest edition of the North American Emergency Response Guidebook will be referenced where applicable. A copy of this guidebook is kept at the facility for use in the event of an emergency. The EC will use this guidebook or other appropriate guidebooks as a reference for determining safe evacuation distances for spills or releases.

Emergency response personnel will address spills and releases as follows:

- Put on protective clothing and equipment.

- Once the area can be safely accessed, remove all injured and unnecessary persons from the hazard area.
- Use 2-way radios for emergency-related communication only.
- If a flammable waste is involved, remove all ignition sources, and use spark and explosion-proof equipment and clothing in containment and cleanup.
- If applicable and can be safely attempted, stop the leak and/or eliminate the feed source via valves, fittings, pumps, barriers, dikes, engineering controls, and/ or other appropriate methods.
- In the event of an uncontrolled leak or spill in the tank or treatment areas, close all feedlines to the affected unit.
- As soon as practical after the spill is detected, initiate removal of standing liquids. Treat and dispose of cleanup materials in an appropriate fashion, in accordance with the WAP.
- Remove surrounding materials that could be dangerously reactive with materials in the spill or release. Determine the major and hazardous components in the spilled or released material.
- Contain, divert, and/or absorb spills not contained by dikes or sumps. Spills contained within the dike or sump can be pumped into an appropriate storage tank, drum, or tank truck.
- Where applicable, neutralize spilled material with the appropriate reagent.

G.4.d.(3) Power Outages/Equipment Failures

Response to power outages are area specific. If the power outage is facility wide, the first consideration is the communications systems. The phone system will be checked. If the phone system is not active, then the radio-phone or cellular phones systems will be checked to determine if they are working.

The internal radio and alarm systems will also be checked. For internal areas where lighting is critical to operations, emergency lighting will be provided or operations will be suspended. If additional lighting is needed for safe operations, then portable, self-powered light facilities will be used.

Power outages occur periodically at the facility and do not present an emergency condition unless they create or exacerbate other incidents. Back-up power in the form of portable generators are available for certain uses during a power outage.

G.4.e Prevention of Recurrence or Spread of Fires, Explosions, or Releases

Actions to be taken to prevent the recurrence or spread of fires, explosions, or releases include shutting down processes and operations, collecting and containing released waste, and/or recovering or isolating containers. If the facility stops operations in response to an emergency, site personnel will monitor valves, pipes, and other equipment for leaks, pressure buildup, gas generation, or ruptures, as necessary, practical, and safe. General inspection requirements are used as guidelines for these activities. Any areas that appear to have the potential for ignition of a fire or explosion will be isolated (if possible) and contingency procedures as described in paragraphs G.4.d.(1) and G.4.d.(2) of this Section will be considered.

G.4.f Storage and Treatment of Released Material

The EC will make proper arrangements for treatment, storage, or disposal of recovered waste, contaminated soil, water, or any other contaminated material as soon as practical after a release or spill. Waste management activities conducted at the facility will be in accordance with the WAP.

G.4.g Incompatible Waste

Wastes that are incompatible with the released material will not be treated, stored, or disposed in the affected area until decontamination procedures are complete, to the extent necessary. This will be accomplished by checking the existing WPFs, laboratory data, and/or manifest data to determine the type of material and its compatibility category. Data and procedures described in the WAP will be utilized in making compatibility determinations.

G.4.h Post-Emergency Equipment Maintenance

All emergency equipment utilized will be cleaned, and all damaged equipment will be repaired or replaced after an emergency event. Examples of various washing solutions are presented in Table G-4. An inspection of all utilized emergency equipment required by this Contingency Plan will be conducted before normal operations are resumed in the affected areas. When there has been full implementation of this Contingency Plan, IDEQ will be notified that cleanup and post-emergency equipment maintenance have been performed in accordance with IDAPA 58.01.05.008 (40 CFR §264.56 (h) and (i)) before operations are resumed in the affected area(s) of the facility (see paragraph G.8 of this Section for reporting requirements).

G.5 Emergency Equipment

In accordance with IDAPA 58.01.05.008 (40 CFR §264.52(e)), the facility maintains equipment necessary for emergency situations. A list of the minimum emergency equipment maintained at the facility is located in Table G-5. The following safety and emergency items and equipment are available at the facility:

- Two-way radios
- Off-site telephone communications
- Additional off-site communications devices include cellular phones
- Decontamination supplies (refer to Tables G-4 and G-6)
- First aid kits, including eye washes and oxygen units, are available at the site. Showers are also available at the site.

Emergency eyewash fountains and showers are located in the process/storage buildings and in the laboratory.

Fire extinguishers are available at numerous locations throughout the facility. These portable fire extinguishers are primarily dry chemical types A, B, and C. Type A is capable of extinguishing fires involving ordinary combustible materials such as wood, cloth, paper, rubber, and many plastics. Type B is capable of extinguishing fires involving flammable liquids, oils, greases, tars, oil-base paints, lacquers, and flammable gases. Type C is capable of extinguishing fires involving energized electrical equipment. All extinguishers comply with National Fire Code standards for portable fire extinguishers. They are inspected after each use (or at least monthly) and recharged as necessary. Records of these inspections are kept in the operating log.

PPE maintained at the facility includes protective suits, gloves, boots, goggles, hard hats, face shields and half-face and full-face air purifying respirators. Airline respirators and self-contained breathing apparatus (SCBA) are also available at the facility. The personal protective equipment (PPE) is readily available for implementation of contingency response procedures.

Water is available at the facility in case of emergencies. Soil is also available for emergency fire control and for use as an absorbent material for containment of spills or leaks. Storage tanks are available at the facility to supply water for a fire emergency. This water may be delivered to the scene with appropriate equipment (e.g. site water truck, etc.)

G.6 Coordination Agreements

In accordance with IDAPA 58.01.05.008 (40 CFR §§264.52(c), 264.37), written working agreements are already in existence between USEI and the organizations shown in Table G-3.

In accordance with IDAPA 58.01.05.008 (40 CFR §264.53(b)) copies of the Contingency Plan are provided to all of the organizations listed in Table G-7 to alert them to the fact that the facility treats, stores, and disposes of hazardous wastes and that the potential exists for injuries relating to chemical exposures, burns, respiratory distress, etc.

In compliance with IDAPA 58.01.05.008 (40 CFR §§264.37(b) and 264.52(e)), it is USEI's understanding that the local authorities (i.e., Owyhee Sheriff's Department) will respond and provide services to emergency incidents involving hazardous materials as the incident dictates. It is also expected that emergency response services will be available from U.S. EPA and the Idaho Department of Environmental Quality in accordance with IDAPA 58.01.05.008 (40 CFR §264.37(a)(3)). Since these agencies must be notified of emergency situations or have teams and individuals that routinely respond to hazardous materials spills, no special agreement is needed for these services. USEI has sent notification letters to various emergency response agencies.

Coordination/contact with emergency response agencies and services may be handled through contact with the IECC dispatcher at 1-800-632-8000.

G.7 Evacuation Plan

In accordance with IDAPA 58.01.05.008 (40 CFR §264.52(f)), in the event of an emergency that could threaten human health or the environment as described herein, it will be necessary to follow an established set of procedures. These procedures will be followed as closely as possible; however, in specific emergency situations, the EC may deviate from the procedures to provide a more effective plan for bringing the situation under control. The EC is responsible for determining which emergency situations require facility evacuation.

The facility employs a warning system with a specific alarm signal to initiate evacuation of facility areas. The warning is a long blast on the civil defense siren , and a verbal evacuation order on the radio. The radios are issued to personnel throughout the facility and are not dependent on alternating current electrical power. The radio transponder is dependent upon a power source, but has a battery back-up with sufficient power to last for 48-hours. Locations are listed in Table G-5.

In addition to the civil defense siren, two-way radios, cellular telephones, and the internal telephone system may be used to notify key facility personnel of the nature of the emergency and the recommended plan of action. Telephones can also be used to summon aid in emergency situations. Employees are trained to respond to the evacuation signals. Total facility evacuation can only be initiated by the EC or their designee.

Evacuation routes and rally points for the facility are shown in Figure G-7. These routes are as follows:

- Route No. 1 - Main Entrance Lemley Road
- Persons evacuating by this route will proceed south and east to the main gate. They will rally outside the main gate. If this is not feasible, the evacuation gate at the SE corner (Gate A) will be used as an alternate.
- Route No. 2 - Gate B
- Persons evacuating by this route will proceed south and west through Gate B and then to the rally point near that gate.

- Route 3 - Gate C_1
- Persons evacuating by this route will proceed north and west through Gate C_1 and then to the rally point near that gate. If this is not feasible, the evacuation gate at the NW corner (Gate C) will be used as an alternate.
- Route 4 - Gate D
- Persons evacuating by this route will proceed north and east through Gate D and then to the rally point near that gate.

Gates A, B, C, C_1, and D will normally be locked with a key lock. The key to these locks is contained in a box next to the gate. Evacuees will take the key, and unlock the gates.

If the needed evacuation route is blocked due to the incident, an alternate route to the rally point may be used. The EC or their designee will determine the safest route to the rally point and will relay the information to site personnel.

In the event facility evacuation is called for by the EC, the following actions will typically be taken:

- The air horn and/or vehicle horn signal for facility evacuation will be activated, and a verbal evauation order will be given over the two-way radios.
- No further entry of unnecessary visitors, contractors, or trucks will be permitted. Vehicular traffic within the facility will cease.
- Site personnel, visitors, and contractors will leave through the exit gates (see Figure G-7 for general evacuation routes), except for properly equipped employees who may be assigned to control access through the gates.
- No persons will be allowed to remain in or re-enter the area unless specifically authorized by the EC. Those within the fenced area will normally include only the rescue team/emergency response and authorized emergency response personnel.
- Site personnel will be accounted for by area. Supervisors may designate certain gates as the safest exits for employees and may identify an alternate exit if the first choice is inaccessible. To assist in the endeavor, the EC will use the internal telephone/radio system to contact the area supervisors and update them of the nature of the emergency.
- Rally points for specific routes are shown on Figure G-7. Immediately upon exiting through a gate, the first person from each work area will begin preparing a list to determine if all personnel by area have been evacuated. Master lists of employees are kept on file at the security building.
- Upon completion of the employee list, the list will be conveyed to the EC. Personnel will remain at their assigned rally points until the “all clear” signal is given to re-enter the facility. In the case of a more severe emergency situation, employees, once accounted for may rally at a position further from the facility.
- Contract personnel and visitors shall be listed with the name of their company.

- The names of emergency team members involved in emergency response will be determined by the EC.
- A final accounting of personnel will be made by the EC.
- An updated list of all personnel will be maintained to aid in the accountability procedure. Employees will prevent entry of any unauthorized persons into the facility.
- Re-entry will be made only after the “All clear” signal is given by the EC. At the EC’s direction, a signal or other notification will be given for re-entry into the facility.
- In all questions of accountability, immediate supervisors will be held responsible for those persons reporting to them. Visitors will be the responsibility of those employees admitting the visitor to the facility. Contractors are the responsibility of those persons administering the individual contracts. Truck drivers are the responsibility of the area supervisor where the truck is loading/unloading. Employees will be assigned to aid in accounting for visitors, contractors, and truckers by reference to the sign-in sheets.
- Drills will be held annually, at a minimum, to practice emergency evacuation.

If the EC's assessment of the situation indicates that evacuation of local areas may be advisable, he will immediately notify the Owyhee County Sheriff either directly or through the IECC. The EC will be available to help appropriate officials decide whether local areas should be evacuated. The Owyhee County Sheriff will notify the local population in accordance with the Owyhee County Notification Plan.

G.8 Required Reports

As required by IDAPA 58.01.05.008 (40 CFR §264.56(i)), any emergency event (e.g., fire, explosion, etc.) that requires implementation of the Contingency Plan will be reported in writing within 15 days to the IDEQ. A report format for emergency events is shown in Table G-8. Additionally, an immediate notification to the Owyhee County Sheriff's Office through EMS and the National Response Center will be made as required in IDAPA 58.01.05.008 (40 CFR §264.56(d)) whenever there is a release, fire, or explosion that could directly threaten human health or the environment outside the facility. Notations of the time, date, and details of any emergency incident that requires implementation of the Contingency Plan will be entered into the facility operating record.

As required in IDAPA 58.01.05.012 (40 CFR §270.30(l)(6)) oral notification must also be made within twenty-four hours of the time USEI becomes aware of a noncompliance which may endanger human health or the environment. Notifications will include a description of the occurrence and its cause; the name, address, and telephone number of the owner or operator; name, address, and telephone number of the facility; date, time, and type of incident; name and quantity of material(s) involved; the extent of injuries, if any; an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable; and estimated quantity and disposition of recovered material that resulted from the incident. Within five (5) calendar days after USEI is required to provide verbal notification, USEI will provide to the Director a written submission that shall include, but not be limited to the name, address, and telephone number of the individual reporting; a description (including cause, location, extent of injuries, if any, and an assessment of actual or potential hazards to the environment and human health outside the facility, where this is applicable) of the incident (noncompliance and/or release); the period(s) in which the incident occurred including the exact dates and times; whether the results of the incident remain a threat to human health and the environment (whether the noncompliance has been corrected and/or the release has been adequately remediated); and if not, the anticipated time it is expected to continue; the steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance; and/or steps taken or planned to adequately remediate the release.

G.9 Amendments to the Contingency Plan

The Contingency Plan will be reviewed and updated and/or amended, as necessary, whenever the following occurs:

- The facility permit is revised.
- The Contingency Plan fails in an emergency.
- The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous wastes or hazardous waste constituents, or where there are changes in the responses necessary in any emergency.
- The list of ECs changes.
- The list of emergency equipment changes.
- There are relevant changes in the requirements of IDAPA 58.01.05.008 (40 CFR Part 264).

At a minimum, the Contingency Plan will be reviewed annually and amended and/or updated (as needed). Plan revisions are recorded, and copies of the revisions are sent by the EC to the organizations listed in Table G-7.

Table G-1 Emergency Coordinators[1]

NAME	TITLE	HOME ADDRESS	PHONE NUMBER
Primary Emergency Coordinator: Wade Roberson	Operations Manager	260 Estate Drive Grand View, ID 83624	(208) 599-2654 home (208) 834-2275 office
Alternate Emergency Coordinator 1: Rick Pollard	Senior Field Technician	850 Riverside Grand View, ID 83624	(208) 350-7342 home (208) 834-2275 office
Alternate Emergency Coordinator 2: Robert Lindquist	Maintenance Supervisor	24918 Missile Base Road Grand View, ID 83624	(208) 761-0680 cell (208) 834-2275 office
Alternate Emergency Coordinator 3: Noel Bailey	Technical Manager	4298 East Thomas Mill Drive Nampa, ID 83686	(208) 250-2749 home (208) 834-2275 office

1.This list is reviewed annually and revised as necessary.

Table G-2 Emergency Contacts[1]

Emergency	Organization/Agency[2]	Phone Number
Any Emergency	Idaho Emergency Communications Center	800-632-8000
	Occupational Medicine Associates	208-367-4197
	St. Alphonsus Hospital (Emergency)	208-367-3221
	St. Alphonsus Medical Center, Nampa	208-463-5100
	Owyhee County Sheriff	208-495-1154
	Grand View EMT	800-632-8000
	St. Luke's Elmore Medical Center	208-587-8401
Fire/Explosion	Idaho Emergency Communication Center	800-632-8000
	National Response Center	800-424-8802
	Boise Fire Dispatch Center	208-384-3400
	Grand View Fire Department	911
Poison Information, Hazardous Material Spill or Release	Poison Information Center [Rocky Mountain Poison and Drug Center]	800-222-1222
	Idaho Emergency Communication Center	800-632-8000
	National Response Center	800-424-8802
If Spill Reaches Navigable Waters	U.S. EPA Region 10	206-553-1263
	U.S. Coast Guard	800-982-8813
	National Response Center	800-424-8802
National Disaster	Idaho Emergency Communication Center	800-632-8000

[1]This information is reviewed annually and revised as necessary.
[2]Other agencies may be contacted as appropriate.
Note: The Idaho Emergency Response Communications Center (aka StateComm) may be contacted in any emergency event, if necessary. It will coordinate the proper agencies or organizations as needed. StateComm can also be contacted on an EMS radio Frequency 2 (155.280).

Table G-3 Current Response Agreements and Phone Numbers

Agency Name	Type of Service	Emergency Phone Number
Idaho EMS System	Communications	800-632-8000
Idaho State Police	Law Enforcement	208-846-7500
Owyhee County Disaster Services	Disaster Services	208-495-1154
St. Alphonsus Medical Center, Nampa[2]	Hospital/ Medical	208-463-5100
St. Alphonsus Medical Center[2]	Hospital/ Medical	208-367-3221
St. Lukes Elmore Medical Center	Hospital/ Medical	208-587-8401
Grand View Fire Department	Fire Fighting	800-632-8000

[1]Indicates phone numbers that are NOT 24-hour phone numbers and are effective only during the normal working day.
[2]These groups provide only supplies, technical information, or contracted services and are not holders of the Contingency Plan. They will be specifically briefed as needed if their services are required.
Abbreviations used:
EMS - Emergency Medical Services
EMT - Emergency Medical Technician
EPA - Environmental Protection Agency
IDEQ- Idaho Department of Environmental Quality
NCP - National Contingency Plan

Table G-4 General Purpose Decontamination Solutions[1]

[1]Not for use on personnel

Type of Hazard Suspected	Solution	Directions For Preparation
1. Inorganic acids, metal processing wastes	A	To 10 gallons of water, add approximately 8 pounds of sodium bicarbonate (baking soda) and approximately 4 pounds of trisodium phosphate. Stir until evenly mixed.
2. Heavy metals: mercury, lead cadmium, etc.	A	Same as item 1.
3. Pesticides, fungicides, chlorinated phenols, dioxins, and PCBs	B	To 10 gallons of water, add approximately 8 pounds of calcium hypochlorite. Stir with wooden or plastic stirrer until evenly mixed.
4. Cyanides, ammonia, and other nonacidic inorganic wastes	B	Same as item 3.
5. Solvents and organic compounds such as trichloroethylene, chloroform, and toluene	C (or A)	To 10 gallons of water, add approximately 4 pounds of trisodium phosphate. Stir until evenly mixed.
6. PBBs and PCBs	B	Same as item 3.
7. Oily, greasy unspecified wastes	C	Same as item 5.
8. Inorganic bases, alkali and caustic waste	D	To 10 gallons of water, add 1 pint of concentrated hydrochloric acid. Stir with a wooden or plastic stirrer.

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Table G-5 Minimum USEI Facility Emergency Equipment

Emergency Category	Equipment Description	Quantity	Equipment Location	Equipment Capability
Reference Materials	2016 or current edition North American Emergency Response Guidebook	1	EHS Office	Provide information on evacuation distances, PPE, etc. in case of chemical emergency
	NIOSH Pocket Guide to Chemical Hazards	1	EHS Office	Provide general industrial hygiene information
Alarm System	Civil Defense Siren	1	Quonset Hut	Capable of activating emergency response teams, alerting employees that an emergency has occurred, and initiating site evacuation.
Facility Communications	Two-way Mobile Radio	Numerous	All of these pieces of communications equipment are located on-site.	Two-way radios are capable of providing communications between employees.
	Commercial Phones	1		Phone lines are capable of communicating with outside emergency response agencies (e.g., County Sheriff).
	Cellular Phones*	1		
Fire Extinguishing Equipment	Dry Chemical Extinguishers 125 lb BC, wheeled	3	Pad 4, PCB Building and in front of Lab Building	Capable of extinguishing Class B and C fires.
	Portable Fire Extinguishers, ABC	Numerous	Throughout site in equipment and buildings	Capable of extinguishing Class A, B, and C fires.
	Portable Fire Extinguishers, D	2	Stored in safety Sea container when not in use at treatment areas	Capable of extinguishing Class D fires.
	Fire Hoses	2	Stored at Outdoor Stabilization Facility	Capable of spraying water onto fire
	Water tank truck (3,500 gallon)	1	Parked on site when not in use elsewhere	Capable of moving fire-fighting water and spraying water onto fire

Mobile Equipment	Loaders	1	Parked on site when not in use elsewhere	Capable of moving dirt for diking and smothering fires.
	Bulldozers	1	Parked on site when not in use elsewhere	Capable of moving dirt for diking and smothering fires.
	Drum Handling Equip.	1 each	Parked on site when not in use elsewhere	Capable of moving containers
	Skidsteer			
	Flatbed Truck			
	Drum Grabber			
	Vacuum/Dump Trucks	1	Parked on site when not in use elsewhere	Capable of moving bulk materials, such as dirt, lime, rock and other materials as needed.
Spill Control Equipment	Empty 55 gallon drums	10	Stored adjacent to Pad 4, 5, 7,and reagent storage areas	Used to overpack containers or repackage waste
	Empty 85 gallon drums	40	Stored adjacent to Pad 4, 5, 7 and in Sea Container – Spill Equipment	
	Empty 275 gallon totes	10	Stored in Sea Container – Spill Equipment	
	Floor-dry or equivalent	1,000 lbs	Pads 4, 5, 7, and Reagent Storage Area	Capable of absorbing and diking various chemicals.
	Generator - 110/220 V, 6.5KW	1	Shop truck	Capable of providing electrical power for emergency use of lights, phone, pumps, etc.
	Generator - Diesel 220V	1	Parked on site when not in use elsewhere	
	Impact wrenches (Air)	1	Shop Truck	Capable of a variety of uses that may arise in an emergency. Containers or tanks may be opened, patched, cut, stabilized as needed.
	Barrel cutters (Manual)	1		
	Acetylene torch	1		
	Arc welder	1		
	Air compressors	1		
	1 ¼ -inch impeller pump	1	Stored in Sea Container – Spill Equipment	Capable of pumping liquids from the ground, tanks, drums, etc.
	1½-inch diaphragm pump	1		
	4-inch centrifugal pump	1		
	Pneumatic drum pump	1		

	Hand Drum pump	1		
Safety and Test Equipment	Photo Ionization Detector with VOC, O_2, LEL	1	Temporary Offices	Capable of use in making initial determination of the nature and extent of chemical releases, and in detecting presence and quantity of chemical/explosive vapors.
	Sample air pump with colorimetric tubes	1	Temporary Offices	
	Portable Eyewash Stations	Numerous	All Operational Areas & Rescue Van	Capable of use for flushing eyes and body as needed in the field.
	Fire blankets	1	Sea Container – Safety Storage	To smother fire as needed.
	Oxygen resuscitators	1	Temporary Offices	For use as needed and prescribed.
	Emergency shower/eyewash	1	Pad 4	To shower and decontaminate/clean personnel as needed.
	EMT Jump Kit	1	Temporary Offices	Capable of providing materials or general first aid response in the event of injuries or acute, chemically caused injuries.
	Scoop stretcher	1	Rescue Van	
	Stretcher	1	Rescue Van	
	Industrial first aid kits	1	Temporary Offices	
Decontamination Solutions	See Table G-6		Sea Container – Safety Storage	
Miscellaneous Equipment	Wooden or Plastic Stirrers	12	Sea Container – Safety Storage	Used to stir decontamination solutions
	Empty, Clean 30 gallon drums	4	Sea Container – Safety Storage	Used for mixing decontamination solutions
Personal Protective Equipment	Air-line with escape bottle	3	Sea Container – Safety Storage or Rescue Van when not in use	Capable of providing level A/B respiratory protection for personnel exposed to hazardous chemicals/constituents.
	Air pack (30 minute)	4	Sea Container – Safety Storage or Rescue Van when not in use	Capable of providing level A/B respiratory protection for personnel

				exposed to hazardous chemicals/constituents.
	Splash suits	4	Rescue Van**	Capable of providing splash and skin protection to individuals handling hazardous chemicals or constituents .
	Safety glasses	4		
	Butyl/neoprene/PVC gloves	4		
	Full-face respirators	4		
Non-sparking Tools	Non-Sparking Pneumatic and Hand tools	Various	Pad 4,5, 7, and Stabilization Facility	Capable of opening containers without igniting flammable liquids or vapors

*Cellular phones are not to be used when a flammable atmosphere is suspected

**The site rescue van is equipped with all of the PPE listed in the Personal Protective Equipment category of the table as well as a stretcher, a scoop stretcher, and fire extinguishers.

Table G-6 Typical Inventory of Decontamination Reagents Maintained at the Facility

Reagent	Minimum Quantity
Sodium bicarbonate	20 pounds
Trisodium phosphate	20 pounds
Concentrated hydrochloric acid	1 gallon
Calcium hypochlorite	20 pounds

- Equipment decontamination supplies kept in the maintenance shop, laboratory building or fire house which include the items shown in Table G-6.

Table G-7 Contingency Plan Distribution List

Copy No.	Title/Organization
1	USEI EC's and Management
2	Hazardous Waste Unit Manager - Boise/DEQ
3	Air and Hazardous Waste Team Leader, U.S. EPA - Boise
4	Hospital Administrator/St. Lukes Elmore Medical Center – Mountain Home, Idaho
5	Grand View Fire Department – Grand View, Idaho
6	Owyhee County LEPC – Grand View, Idaho
7	Elmore County LEPC – Mountain Home, Idaho
8	Owyhee County Library - Grand View, Idaho
9	Grand View Ambulance – Grand View, Idaho
10	Idaho State Police
11	Idaho EMS System

Table G-8 Reporting Format for Emergency Events

Name, address, and phone number of owner or operator

Name, address, and phone number of facility

Date, time, and type of incident (e.g., fire, explosion, etc.)

Name and quantity of material(s) involved

Extent of injuries (if any)

Assessment of actual or potential hazards to human health or the environment

Estimated quantity and disposition of material recovered from the incident

Table F-1 Inspection Schedule

Location	Potential Problems	Minimum Frequency (Typical Figure Reference)
Container Management Units	Spills, equipment, structural integrity of containers	Normal Working Day (Fig. F-1, F-5, F-6, F-7, F-19, F-20, F-21,
Waste Water Tank Systems	Spills, structural integrity, volumes	Daily (Fig. F-2)
Waste Water Storage Tanks - Wall Thickness	Corrosion, erosion, delamination, disintegration Ultrasonic Thickness Tests	Every 3 years
Mix Bin Tanks MBT-1,2, 3, 4 (Inside Containment Building)	Secondary Leak detection system, volume of liquid removed, structural integrity, spills	Normal Working Day[1,2] (Fig. F-2a)
Mix Bin Tanks MBT-1, 2, 3, 4 (Inside Containment Building)	Structural Integrity	Every 3 years
Surface Impoundments	Liquids in leak detection system	Normal Working Day[1,2] (Fig. F-3) and after 1/2" in a 24-hour storm
Landfill Areas	Integrity, cover, liner, accessibility, safety, dust, collected water, excess liquids in primary leachate collection/secondary leachate detection systems	Weekly and after 1/2" in a 24-hour storm (Figs. F-4, F-4d, and F-4j) Monthly and after 1/2" in a 24-hour storm (Figs. F4a, b, and c)
	Primary leak detection systems	Weekly and after 1/2" in a 24-hour storm (Figs. F-4e,f,g, and h) Daily (Fig. F-4i)
	Secondary leak detection systems	Normal Working Day[1,2] (Figs. F-4e,f,g, h, and i)
Stabilization Facility	a.) Spills, accessibility, housekeeping; inspect the entry ways/exits for accessibility, check for spills in truck processing and waste handling/storage areas. b.) Integrity of containment ramps c.) Liquids in containment areas	Normal Working Day[1,2] (Fig. F-5)
Containment Building (Debris portion)	Spills, accessibility, equipment, structural and container integrity, dust	At Least Weekly(Fig. F-6)
	emissions, liquids in LDCRS	
	a.) Spills, accessibility, housekeeping; inspect the entry ways/exits for accessibility, check for spills in truck processing and waste	Normal Working Day[1,2] (Fig. F-6)

Table F-1 Inspection Schedule

Location	Potential Problems	Minimum Frequency (Typical Figure Reference)
	handling/storage areas. b.) Integrity of containment ramps, overhead doors, entry-ways and exits. c.) Liquids in collection trenches, grating over collection trenches intact; remove and manage any pumpable liquids in accordance with Permit Condition II.E and the WAP, check integrity of grating over collection trenches. d.) Process equipment; inspect size reduction system and process equipment to ensure that inlets and screens free of tramp materials, grates secured, belt guards in place. e.) Liquids in LCRS and LDCRS; inspect the primary and secondary leak detection collection and removal systems for liquids, remove and manage any pumpable liquids. f.) Inspect the steel bin(s) for tears or cracks	
Containment Building (Stabilization portion)	a.) Inspect Dust Collection System for equipment integrity and function b.) Inspect liquids in LCS and LDCRS collection system integrity.	At Least Weekly (Fig. F-7)
	c.) Spills, accessibility, housekeeping; inspect the entry ways/exits for accessibility, check for spills in truck processing and waste handling/storage areas. b.) Integrity of containment ramps. c.) Liquids in containment areas. d.) Liquids in LCS and LDCRS; inspect the primary and secondary leak detection collection and removal systems for liquids. e.) Operation of APC equipment. f.) Inspect the visible concrete wear surface	Daily when in use Normal Working Day[1,2] (Fig. F-7)

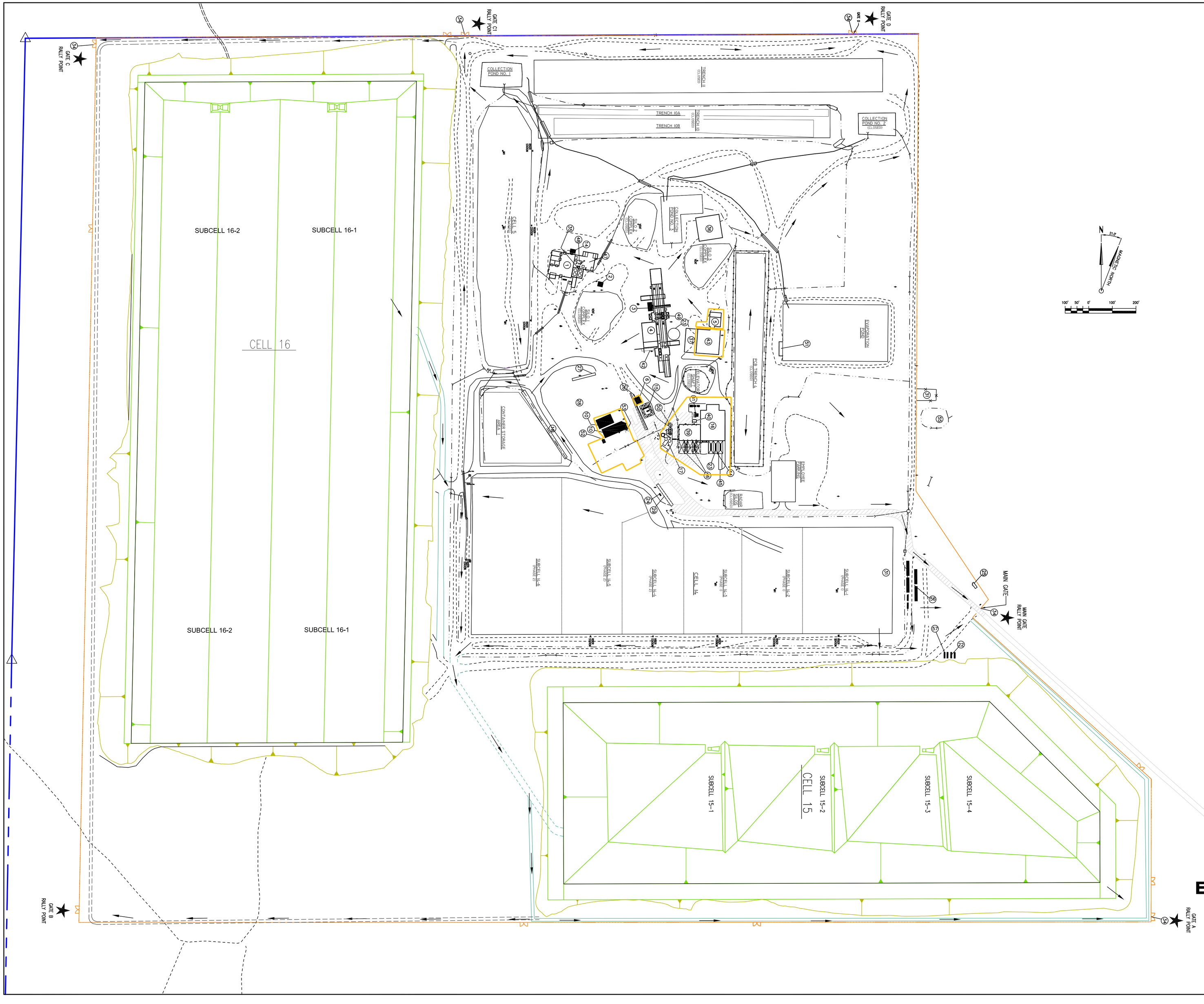
Table F-1 Inspection Schedule

Location	Potential Problems	Minimum Frequency (Typical Figure Reference)
	associated with the primary liner for cracks, gaps, corrosion, or deterioration. g.) Inspect the steel wear plates for tears or cracks.	
	a.) Annual inspection and maintenance of the mixing bins. b.) Inspect bottom steel wear plates for distortion and exposure of supporting media.	Annual
Vehicle Wash	Sumps leaking/full, controls/valves not working, equipment damaged, drainage inadequate	Normal Working Day[1,2] (Fig. F-8)
Roads, Drainage, Run-on/run-off	Malfunction, blockage, integrity spillage	Weekly and after 1/2" in a 24-hour storm (Fig. F-9)
Gates/Fence	Functional, damage, deterioration	Monthly (Fig. F-10)
Yard and Truck Scale Areas	Spills, mechanical or electrical failure, damage, or deterioration	Normal Working Day[1,2] (Fig. F-11)
Staging/Unloading/Loading Areas	Accessibility, spills, integrity	Normal Working Day[1,2] (Figs. F-12, F-19, F-20, F-21, F-22)
Monitoring Wells	Unlocked, tampering	Monthly (Fig. F-13)
Contingency Plan – Response Equipment (radios, etc.)	Functional	Monthly (Fig. F-14)
Past Practice Units	Integrity	Weekly (Fig. F-15)
Past Practice Carbon Units	Carbon System Integrity	Monthly (Fig. F-18)
Leachate Treatment and Piping System	Pipe and support system integrity, system non-operational, spillage	Normal Working Day[1,2] (Fig. F-24)

[1] Performed only for those equipment/areas in use during the day of the inspection.

[2] A Normal Working Day is defined as any scheduled working day (excluding weekends and holidays) where waste management activities occur at the facility.

USEI RCRA PART B PERMIT
EPA ID. No. IDD073114654
Date: May 31, 2019



LEGEND

- EXISTING FENCE LINE
- PROPERTY BOUNDARY
- EXISTING UNIMPROVED ROAD
- EXISTING PAVED ROAD
- RCRA UNIT BOUNDARY
- (34) FACILITY KEY NUMBER
- ★ RALLY POINTS
- CAUTION AREA

FACILITY KEY

1 CONTAINER STORAGE PAD 4
2 COMPRESSOR/MCC BUILDING
3 STABILIZATION FACILITY OFFICE/FINGERPRINT LAB
4 STABILIZATION FACILITY
5 PCB PROCESSING BUILDING–OUT OF SERVICE
6 VEHICLE WASH FACILITY
7 "UNASSIGNED"
8 "UNASSIGNED"
9 "UNASSIGNED"
10 MAINTENANCE SHOP
11 "UNASSIGNED"
12 "UNASSIGNED"
13 "UNASSIGNED"
14 PAD 4 OFFICE
15 FUEL STORAGE TANKS/FUELING STATION
16 CONTAINMENT BUILDING–OUT OF SERVICE
17 PUMP HOUSE/WATER STORAGE TANKS
18 COMPRESSED GAS STORAGE AREA
19 "UNASSIGNED"
20 "UNASSIGNED"
21 "UNASSIGNED"
22 RECORDS STORAGE BUILDING
23 REAGENT STORAGE
24 SCALE HOUSE
25 SECURITY BUILDING
26 PROPANE TANK
27 SAMPLING PLATFORM
28 STAGING AREA
29 TRUCK SCALE
30 "UNASSIGNED"
31 WEATHER STATION
32 "UNASSIGNED"
33 "UNASSIGNED"
34 EVACUATION GATES
35 RCRA STORAGE TANKS–4 UNITS
36 CONTAINER STORAGE PAD 5
37 PAD 6–RCRA STORAGE BUILDING APRON
38 "UNASSIGNED"
39 STABILIZATION BUILDING–OUT OF SERVICE
40 BAG HOUSE–OUT OF SERVICE
41 HEPA FILTER HOUSE AND FAN–OUT OF SERVICE
42 YARD TRUCK SCALE
43 CONTAINER STORAGE PAD 7
44 CONTAINMENT BUILDING TRUCK UNLOADING APRONS 1,2 AND 3–OUT OF SERVICE
45 CONTAINMENT BUILDING TRUCK UNLOADING RAMP–OUT OF SERVICE
46 STABILIZATION BUILDING TRUCK UNLOADING APRONS 1 AND 2–OUT OF SERVICE
47 PROCESS PLANT PAD
48 LEACHATE TREATMENT SYSTEM
49 STABILIZATION FACILITY ADDITIVE SILOS
50 STABILIZATION BUILDING ADDITIVE SILOS–OUT OF SERVICE
51 EVAPORATION POND LOADING/UNLOADING AREA
52 OFFICE TRAILER SANITARY TANK
53 LAB WASTE HOLDING TANK
54 "UNASSIGNED"
55 ET CAP TEST PAD
56 TEMPORARY ADMINISTRATION TRAILERS
57 SAFETY SEA CONTAINER

FIGURE G-7
Site Plan
Evacuation Routes & Rally Points

US ecology

FIGURE F-14

CONTINGENCY PLAN – RESPONSE EQUIPMENT INSPECTION FORM (MONTHLY)

ALARMS, FIRST AID & FIRE EQUIPMENT:
- First Aid Equipment Missing/Nonfunctional
- Civil Defense Siren Functional
- Water Source, Pump Condition
- Fire Extinguisher Missing/Not Full
- Hydrant, pump and pond (Lemley Rd.) condition

PPE & COMMUNICATIONS:
- Suits, Gloves, Boots, Goggles, Hardhats, Face Shields
- Respirator (1/2 face and full face) Integrity
- Two-way Radios Functional
- Offsite Communication Available (Cellular Phone)

SCBA & AIR LINE RESPIRATORS:
- Mask Condition
- Harness, Belts, Clamps Functional
- Cylinders Full/Functional
- Regulator Functional
- Air Tube Integrity

GENERAL:
- Housekeeping
- Access
- Showers

DATE / TIME	INSPECTOR	ITEM/LOCATION	DISCREPANCY	CORRECTIVE ACTION		
				DATE	NAME	ACTION
*		**SCBA**				
*		**PPE & COMM**				
*		**FIRST AID**				
*		**FIRE EQUIPMENT**				
*		**EYE WASH UNITS**				
		ALARMS				

* Inspection times vary on days noted

ATTACHMENT 26
Permit Modification Tracking Log

Date of Submittal	Modification	Date of Approval / Rejection	Date Pages Replaced	Initials
8/5/2016	Permit Condition II.S: Revised Figure F-2 to include weekend/holiday inspection of storage tanks.	5-Aug-16	5-Aug-16	
4/4/2017	Permit Condition II.S: Revised Table F-1 to include inspection of primary leak detection systems after 1/2" rain event in 24 hours.	4-Apr-17	4-Apr-17	
5/31/2017	Class 1 Modification: Revised Part A Permit Application	31-May-17	31-May-17	
7/21/2017	Class 2 Modification: Structural Stability and Remedial Improvements for Landfill Cell 14, Phase 1 Primary Leachate Risers	27-Sep-17	2-Nov-17	
10/11/2016	Class 3 Modification: Modified Cell 16 Design and Evaporation Pond Reconstruction	18-Nov-17	22-Nov-17	
4/2/2018	Class 1 Modification: Administrative Changes to Incorporate Well U-54 Construction Data and Figure F-24	2-Apr-18	2-Apr-18	
7/6/2018	Class 1 Prime Modification: Aisle Space Requirements and Marking of Containers for Off-Site Shipment	1-Aug-18	9-Aug-18	
1/24/2019	Class 2 Modification: Site Contingency Plan and Request to Undertake Direct Disposal Operations	3-Apr-19	23-Apr-19	
5/6/2019	Class 1 Modification: Administration Area Air Sample Location Change	15-May-19	15-May-19	
5/31/2019	Class 2 Modification: Update of Site Inspection Plan, Contingency Plan, and Hazards Prevention Plan	31-May-19	7-Aug-19	
7/2/2019	Class 1 Prime Modification: Closure Plan Revision to Update Containment Building Closure Schedule	11-Jul-19	11-Jul-19	